IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,

Plaintiffs,

v.

RICK PERRY, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR) (Consolidated Action)

THE TAYLOR PLAINTIFFS' SUPPLEMENTAL BRIEF IN SUPPORT OF THEIR APPLICATION FOR ATTORNEY'S FEES

As this Court is acutely aware, the litigation over Texas' unconstitutional voter I.D. law has been long-running and complex. Such complicated and protracted litigation carries substantial costs and demands an enormous time commitment from the attorneys working the case. Those costs are often borne, as they are here, by nonprofit organizations with limited resources, whose budgets and staffing are strained by taking on long, complex constitutional litigation in support of fundamental rights. That is precisely why Congress provided for fee-shifting when meritorious suits give life to the Voting Rights Act and to the federal Constitution. Without fee-shifting, such rights would be all but impossible to vindicate through the courts.

The State Defendants ask the Court to undermine enforcement of the Voting Rights Act and fundamental constitutional rights by requiring the Taylor Plaintiffs' attorneys to self-fund much of this expensive litigation. Even though the Taylor Plaintiffs have *already* no-charged over 700 hours of work by its attorneys and paralegals,² discounting its attorney's fees by over \$600,000—nearly 40

¹ Plaintiffs La Union del Pueblo Entero ("LUPE"), Lenard Taylor, Eulalio Mendez, Jr. Lionel Estrada, Estela Garcia Espinosa Maximina Martinez Lara (the "Taylor Plaintiffs").

² As mentioned in the Taylor Plaintiffs' fee application, they relied on the assistance of many TRLA staff attorneys (such as Peter McGraw, Priscilla Noriega, Kathryn Newell, and Kathryn Youker) and paralegals (such as Kathleen Griesbach),

percent of their billings—the State Defendants want this Court to slash their fee award by another \$354,910, effectively wiping out compensation for years of work. Resp., Dkt. 1196, at 93–94. Such an aggressive markdown is unwarranted and unreasonable.

The State Defendants divide their markdown requests into nine categories: (1) market rates, (2) travel time, (3) work on the fee application, (4) clerical, (5) duplicative, (6) excessive, (7) business development, (7) excessive, (8) a 20 percent across-the-board reduction, and (9) undocumented expenses. *Id.* The Taylor Plaintiffs' reply addresses each separately in this brief's subsections.

I. ARGUMENT

A. The Taylor Plaintiffs' Requested Rates are Reasonable.

All of the arguments made by the Private Plaintiffs concerning the proper market rate for their counsel apply to counsel for the Taylor Plaintiffs: this case could not have been adequately litigated by counsel in Corpus Christi, precedent supports using 2018-19 rates, and the State Defendants' proposed rates are illogical and misapplied. The Taylor Plaintiffs join the Private Plaintiffs' reply on this issue, adopt their arguments concerning the appropriate rate of compensation, and ask the Court to award attorney's fees to the Taylor Plaintiffs at the rates requested in their fee application.

B. Because the Taylor Plaintiffs Have Already No-Charged Over 60 Percent of Their Travel Time, Further Cuts Would be Excessive.

There are two major problems with the State Defendants' position on travel time. Resp., Dkt. 1196, at 40–42. First, courts typically do not reduce either the number of hours or the hourly rate for travel time when an attorney spends that time working. *See Robinson v. Nexion Health at Terrell Inc.*, 3:12-CV-3853-L-BK, 2017 WL 5891790, at *3 (N.D. Tex. Nov. 1, 2017), *report and recommendation adopted*, 2017 WL 5714795 (N.D. Tex. Nov. 28, 2017) (declining to reduce the hours

who assisted with research, client outreach and other valuable services. In the exercise of billing judgment, the Taylor Plaintiffs are not requesting fees for any of these individuals' work.

spent traveling to New Orleans for oral argument where counsel averred that he was reviewing briefs, making notes, and preparing his responses to questions during the trip). Here, many of the "travel" hours listed by the State Defendants are hours spent working. For example, on November 22, 2013, most of the 6.4 hours billed by Jose Garza was spent preparing for and meeting with one of Plaintiffs' experts. *See* Resp. Ex. E-1, Dkt. 1196-32, at 3. On September 5, 2014, most of the 10.8 hours billed by Jose Garza was spent in trial. *Id.* The State Defendants misleadingly lump in hours spent working with hours spent traveling and ask the Court to discount all of those hours as travel time. That unjustified request should be discredited and denied.

Second and more importantly, although a district court may be within its discretion to reduce the number of hours or the rate—but not both³—awarded for travel, it is also within its discretion *not* to reduce travel hours or rate, especially when either has already been substantially reduced. *See Canaski v. MID Mississippi Properties, Inc.*, 1:15CV344-HSO-JCG, 2017 WL 4531690, at *6 (S.D. Miss. May 17, 2017) (declining to cut travel hours by 50 percent where the court had already "substantially reduced Plaintiffs' compensation for travel"). Here, the Taylor Plaintiffs' counsel have already done the Court's work to reduce their travel billings by seeking compensation for <u>only 131.3</u> <u>out of 343.3 hours spent on travel</u> by attorneys and staff. Moreover, by asking the Court to reduce *both* the number of hours by 50 percent *and* counsel's rate by 35 to 45 percent, the State Defendants are seeking a much larger reduction in travel compensation than is typical in this circuit.

Had the Taylor Plaintiffs not already made deep cuts to their counsel's travel hours in their fee application, a reduction in either the number of hours or the hourly rate (but not both) for travel time might be warranted. However, because they have <u>already no-charged 62 percent</u> of their travel hours, a full 50-percent reduction of the remaining hours—compounded by a 35 to 45 percent

³ In none of the State Defendants' cited cases do courts cut *both* the number of hours billed for travel *and* the hourly rate during those hours—it is always one or the other. *See* Resp., Dkt. 1196, at 40–41 (citing cases). To cut both, as the State Defendants request, would be anomalous and excessive.

rate cut—would unfairly ignore the billing discretion already exercised. The Court should compensate the Taylor Plaintiffs for all of their travel time at each attorney's typical reasonable rate.

C. Many of the Hours in Exhibit E-2 are Non-Clerical, and Even the Clerical Work Should Be Compensated, Albeit at a Lower Rate.

"There is no precise test for determining whether a task is legal or clerical." *Malick v. NCO*Fin. Services, Inc., CIV.A. H-14-1545, 2015 WL 4078037, at *5 n.4 (S.D. Tex. July 6, 2015). The State Defendants make no attempt to provide a fact-specific analysis of the Taylor Plaintiffs' billing records; they simply list the billing entries in a table and summarily ask the Court to write off all of those hours. Resp., Dkt. 1196, at 44. To do so would be unjustified, not least because many of those hours are nonclerical. For example, Jose Garza's billing entries are largely for legal work; to review correspondence, filings, notices, and transcripts for substantive and procedural legal issues involves the exercise of legal judgment and analysis. See Tejero v. Portfolio Recovery Associates LLC, AU-16-CV-767-SS, 2018 WL 1612856, at *5 (W.D. Tex. Apr. 2, 2018) (finding that "reviewing filings" was legal work, not clerical). Only the time spent organizing files (1.7 out of 8.5 hours) can be properly classified as clerical.

Likewise, although some of Marinda van Dalen's Exhibit E-2 hours are properly classified as clerical, others are not. Time spent preparing materials for Mr. Jewell to review, preparing a schedule for discovery, reviewing documents, and preparing documents for production are legal work, since those tasks involve the application of legal judgment and analysis. *See Jimenez v. Paw-Paw's Camper City, Inc.*, CIV.A. 00-1756, 2002 WL 257691, at *23 (E.D. La. Feb. 22, 2002) (finding that preparing for depositions and reviewing discovery constituted legal work, not clerical).

Moreover, even those hours properly classified as clerical should still be compensated, only

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⁴ A task may be legal even if it is not complex, such as assisting with document production, preparing subpoenas, conducting factual investigation, and preparing correspondence. *See City of San Antonio, Texas v. Hotels.com*, L.P., 5-06-CV-381-OLG, 2017 WL 1382553, at *6 (W.D. Tex. Apr. 17, 2017) (collecting cases). And work that is clerical in some contexts may be essential and reasonably recovered in a fee award in others. *See Depriest v. Walnut Grove Corr. Auth.*, 310CV00663CWRFKB, 2018 WL 1958285, at *2 (S.D. Miss. Apr. 25, 2018).

at a lower rate. Although some courts in this circuit will apply a blanket fee reduction—often 5 percent—to account for clerical work, other courts will apply a reasonable hourly rate for paralegal work to each item of clerical work. *See Saldivar v. Austin Indep. Sch. Dist.*, A-14-CA-00117-SS, 2016 WL 1064654, at *4 (W.D. Tex. Mar. 15, 2016), *aff'd*, 675 F. App'x 429 (5th Cir. 2017) (awarding \$125 per hour for clerical work based on reasonable rates for a paralegal in the San Antonio market in 2013–14). Given that the Taylor Plaintiffs' counsel's hours are already itemized, the Court should reduce the hourly rate for clerical work rather than apply a blanket reduction, which would result in an excessive markdown.

In brief, the Taylor Plaintiffs agree that some of the hours listed in the State Defendants' Exhibit E-2 are properly classified as clerical and should be compensated at a reasonable hourly rate for paralegals, which is \$125 an hour in the San Antonio market. Those hours constitute only 1.7 out of the 8.5 hours billed by Jose Garza and 11.8 out of the 17.3 hours billed by Marinda van Dalen. The remaining hours are legal work that should be billed at those attorney's typical reasonable rates. The Taylor Plaintiffs therefore urge the Court to award fees for their attorneys' Exhibit E-2 hours as follows:

- Jose Garza:
 - o 1.7 hours at \$125/hour: \$212.50
 - o 6.8 hours at \$613/hour: \$4,168.40
- Marinda van Dalen:
 - o 11.8 hours at \$125/hour: \$1,475.00
 - o 5.5 hours at \$544/hour: \$2,992.00
- Exhibit E-2 subtotal: \$8,847.90

D. None of the Taylor Plaintiffs' Requested Hours are Duplicative.

The State Defendants' request that the Court to cut 86.5 hours for being "duplicative" is unsupported. For one thing, their own Exhibit E-3 only identifies 70.4 hours of work, so it is unclear where (if anywhere) they came up with 86.5 hours. *Compare* Resp., Dkt. 1196, at 50, *with*

Resp. Ex. E-3, Dkt. 1196-34. More importantly, the hours alleged to be "duplicative" are simply not duplicative. Most of the billing records listed are for discussions with co-counsel such as Mr. Rosenberg and Ms. van Dalen. Those billing entries are not duplicative simply because they involved more than one lawyer. It is important to have case management discussions in multi-party litigation exactly to avoid duplication and to coordinate presentations. Other billing entries—such as Jose Garza's 2.5- and 3.0-hour entries for trial preparation in August and September 2014—involve only one attorney and the State Defendants offer no explanation for labeling them "duplicative." *See* Resp. Ex. E-3, Dkt. 1196-34, at 3. The Court should not cut facially reasonable billings when the State Defendants make no effort to explain how they might be duplicative. Finally, as noted above, the Taylor Plaintiffs' fee application has already been reduced by over \$600,000 precisely because counsel exercised billing judgment to account for potential duplication. No further reduction for duplication should be made.

E. None of the Taylor Plaintiffs' Requested Hours are Excessive.

Again without explanation, the State Defendants ask the Court to cut 46.5 hours as "excessive." Resp., Dkt. 1196, at 53. Even a cursory review of these "excessive" billings shows their request to be baseless.

For example, one "excessive" billing is for Jose Garza's work during the September 3, 2014, trial. Resp. Ex. E-3, Dkt. 1196-35, at 2. Mr. Garza, who took an active role in that trial, claims 9.0 hours worked during the trial and 3.3 hours before and after trial that day conferring with cocounsel and preparing. *Id.* According the State Defendants, the 9-hour billing for trial is excessive because the actual trial time was 8 hours and 11 minutes. Resp. Ex. F, Dkt. 1196-40, at 2. To correct for this alleged overcharge of 49 minutes, the State Defendants ask the Court to deny compensation for *the entire 12.3 hours*. Resp. Ex. E-3, Dkt. 1196-35, at 2. The Taylor Plaintiffs might not object to a

⁵ And, notably, the State Defendants make no effort to explain how they might be.

50-minute reduction for that billing entry, but there is no basis for denying compensation for 12.3 hours of trial work because of a dispute over 50 minutes. The State Defendants' list of so-called "excessive" billings is plagued by similarly misleading entries, such as:

- A 1.2-hour entry for work on a November 25, 2013, hearing. The entry includes time spent preparing for that hearing and conferring with co-counsel. The State Defendants allege that that hearing took only 51 minutes and therefore ask the Court to deny compensation for the full 1.2 hours.
- A 4.7 hour entry for work on a February 12, 2014, hearing. The entry includes time spent travelling and conferring with co-counsel. The entry explicitly allots only 1.2 hours to the hearing. Defendants allege that that hearing took only 46 minutes and therefore ask the Court to deny compensation for the full 4.7 hours.

Resp. Ex. E-3, Dkt. 1196-35, at 2; Resp. Ex. F, Dkt. 1196-40, at 2. The Court should not condone the State Defendants' overbroad attempt to deny compensation for reasonable work.

For billing entries not related to hearings, the State Defendants make no attempt to explain how they might be excessive. For example, they offer no basis for the Court to find that it was excessive for Mr. Garza to spend 6.5 hours researching, drafting, and editing a brief on January 13, 2014. Resp. Ex. E-3, Dkt. 1196-35, at 2. No mention is made of what the brief was or why Mr. Garza should have spent less time on it. *Id.* The Court should not take the State Defendants at their word for it, especially where the bases they have given for other entries are so nakedly overstated. And finally, again, the Taylor Plaintiffs have already discounted many hundreds of hours of work worth over half a million dollars. No reductions should be made for excessive billings.

F. A 20 Percent Across-the-Board Reduction is Completely Unjustified by 20.1 Hours of Allegedly Vague or Block-Billed Work.

The State Defendants complain that 20.1 hours' worth of billing entries are either vague or block-billed. Resp. Ex. E-6, Dkt. 1196-37; Resp. Ex. E-7, Dkt. 1196-38. Rather than seeking a reduction for only these 20.1 hours, the State Defendants ask the Court to reduce *all of the Taylor Plaintiffs' hours* by 20 percent, cutting the fee award by more than \$200,870. Resp., Dkt. 1196, at 57. This request is not made in good faith: they are asking for a 20-percent reduction to hundreds of

hours or work that *the State Defendants concede* is not vague or block-billed. The Taylor Plaintiffs do not object to cutting the 20.1 hours actually identified by the State Defendants as vague or block-billed. *See* Resp. Ex. E-6, Dkt. 1196-37; Resp. Ex. E-7, Dkt. 1196-38. But a 20-percent reduction to all of the Taylor Plaintiffs' hours, which they have already reduced by 40 percent through the use of billing discretion, is completely unjustified.

G. The Hours and Rate Requested for Work on the Fee Application Are Reasonable.

In the middle of their 100-page brief, State Defendants suggest with a straight face that the fee application in this case should not "result in a second major litigation" and that this fee application does not "involve complex legal issues." Resp., Dkt. 1196, at 57 (quoting cases). Perhaps the naked hypocrisy of that position explains why they merely insinuate it without explanation. *Id.* at 57–59.

This litigation has spanned seven years, requiring a nine-day bench trial after vigorous pretrial litigation, a merits appeal to the Fifth Circuit, rehearing *en bane*, litigation over the proper relief on remand, and another appeal on the ultimate relief granted. This long, complex litigation has required over thousands of hours of work by the plaintiffs' counsel and their staff. To properly prepare a motion for attorney's fees at the end of that litigation, the plaintiffs' counsel had to review all of those thousands of hours of work to properly exercise billing discretion. On top of that, the State Defendants have opposed nearly every aspect of the plaintiffs' fee application. This fee application is complicated partly because of the nature of this case, and partly because of the State Defendants' own aggressive litigation of the fee application.

The State Defendants ask the Court to reduce Jose Garza's hours by 20 percent and his rate by 35 percent. Resp., Dkt. 1196, at 59. The result would be to cut compensation for his work on the plaintiffs' fee application by nearly 50 percent, down to \$13,472.00 from \$25,807.30. *Id.* Their only argument in favor of such a draconian markdown comes from a set of cases where courts awarded

an attorney 80 percent of his or her fee for hours worked on a fee application. *Id.* at 58. But those cases—none of which support a 50 percent reduction—do not support any degree of rate reduction in this case.

What the State Defendants omit from their brief is that the reason for cutting an attorney's rate on fee-application work is that often, a fee application is a straightforward task appropriate for a less experienced attorney. Right before the State Defendants' quote from *Leroy v. City of Honston*, 906 F.2d 1068 (5th Cir. 1990), that court explains that "hourly rates near the top of the scale" may be inappropriate if a task "could have been properly accomplished with greater overall cost efficiency by competent personnel whose lesser experience and skill would not justify such high rates." *Id.* at 1079. Nowhere does the Fifth Circuit say that rates for work on a fee application are reduceable *per se*; rather, an attorney's rate should be reduced only when the application can be completed by a less experienced attorney. *See id.*

That is not the case here. An experienced attorney was needed to scrutinize the billing entries for hundreds of hours of work by a large team of attorneys to ensure the appropriate exercise of billing discretion. An experienced attorney was needed to anticipate the prevailing-party and *Johnson*-factor issues raised by the State Defendants. Put another way: it is simply not credible for the State Defendants to file a 100-page response raising dozens of different legal challenges to the plaintiffs' fee application and then to claim that plaintiffs' counsel should be compensated at a reduced rate because the fee application is a simple motion that an inexperienced attorney could handle. Because it was reasonable for Jose Garza to prepare the Taylor Plaintiffs' fee application, rather than a less experienced attorney, it is reasonable to award him his customary rate, rather than to discount that rate by 20 percent (or by more, as the State Defendants request without justification).

H. The Taylor Plaintiffs' Fee Request Does Not Include Time Spent on "Business Development."

The State Defendants ask the Court to deny any compensation for over 30 hours of work they deem "business development" without analyzing those time entries at all. Resp., Dkt. 1196, at 65–67. Their Exhibit E-8 includes time that counsel spent meeting with people affected by SB 14—including actual clients—which constitutes fact investigation with potential witnesses. Resp. Ex. E-8, Dkt. 1196-39, at 1–5. That exhibit also includes time spent meeting with potential intervenors and obtaining evidence supporting the plaintiffs' claims. *Id*.

The work listed in Exhibit E-8 was not expended to develop Texas RioGrande Legal Aid's business—a concept that makes little sense for a legal aid provider.⁶ That work was done to develop the evidence in this case and advance the goals of the plaintiffs in this action. Time and effort spent interviewing clients and researching the facts of a case is "reasonably expended in litigation" not least because such careful fact investigation is ethically required. See Webb v. Bd. of Educ. of Dyer County, Tenn., 471 U.S. 234, 250 (1985) (Brennan, J., concurring) (quoting Hensley v. Eckerhart, 461 U.S. 424, 433 (1983)). Indeed, federal courts have disregarded mischaracterizations of time as "business development" when it was clear that the attorneys were developing the facts of a claim through interviews with potential clients and witnesses. See Bratcher v. United States, 136 Fed. Cl. 786, 794 (2018), reconsideration denied sub nom. Michael A. v. United States, 137 Fed. Cl. 645 (2018). The work mischaracterized as "business development" in Exhibit E-8 should be compensated at each attorney's typical reasonable rate given the actual substance of the work performed, with one exception: the Taylor Plaintiffs do not object to cutting 2.0 hours from Mr. Doggett's billings based on the vague time entry listed in Exhibit E-8. Resp. Ex. E-8, Dkt. 1196-39, at 2.

⁶ TRLA represents low-income clients for free in civil cases. Each year, TRLA receives tens of thousands more requests for service than it has the capacity to accept. The notion that interviewing potential clients (who also happen to be potential fact witnesses) for this action somehow furthers the business of a nonprofit law firm that provides free legal services to the poor is nonsensical on its face.

I. The Taylor Plaintiffs' Requests for Expenses are Supported by Documentation.

The State Defendants ask the Court to deny them all of their expenses based on a lack of documentation. Resp., Dkt. 1196, at 72. The documentation attached as Exhibits B–G to this supplemental brief provides that documentation. Because the Taylor Plaintiffs agree that they will only seek to recover documented expenses, they have revised their claim for expenses downward slightly to \$40,094.35. *See* Taylor Supp. Exs. B–G.

As for the State Defendants' unsupported objection to expenses relating to client outreach and communication, that objection is baseless. 42 U.S.C. § 1988 permits the recovery of reasonable out-of-pocket expenses such as travel and telephone calls to clients. *See Gros v. New Orleans City*, CIV.A. 12-2322, 2014 WL 3894371, at *4 (E.D. La. Aug. 8, 2014) ("[A]ll reasonable, out-of-pocket expenses, including charges for photocopying, paralegal assistance, travel, and telephone, are recoverable in [S]ection 1988 fee awards because they are part of the costs normally charged to a fee-paying client.") (citation omitted). As discussed above, travel to interview fact witnesses and clients is appropriately billed to a fee-paying client because such work is essential to ethically developing a claim for relief. As it would be reasonable to charge these travel expenses to fee-paying clients, it is appropriate to seek reimbursement of these expenses under Section 1988.

II. CONCLUSION

For the reasons given above and in the Taylor Plaintiffs' fee application and supporting briefing and exhibits, the Taylor Plaintiffs ask the Court to award them the following reasonable attorney's fees and expenses under the Voting Rights Act and Section 1988:

- Attorney's fees
 - o Jose Garza: 460.7 hours at \$613/hr. = \$282,409.10
 - o Jose Garza (clerical): 1.7 hours at \$125/hr. = \$212.50
 - o Marinda van Dalen: 1138.8 hours at \$544/hr. = \$619,507.20
 - o Marinda van Dalen (clerical): 11.8 hours at \$125/hr.: \$1,475.00
 - o Robert Doggett: 143.6 hours at \$572/hr.: \$82,139.20
 - Total attorney's fees: \$985,688.60
- Expenses
 - o Filing fee and process service fee: \$590.00
 - o Expert expenses: \$31,442.72
 - o Travel expenses for client outreach and communication: \$2,031.17
 - o Travel expenses for depositions, ct. hearings and trial: \$5,855.46
 - Other trial expenses (interpreter): \$175.00
 - Total expenses: \$40,094.35

Respectfully submitted,

/s/ Jose Garza JOSE GARZA

State Bar No. 07731950

ATTORNEY FOR TAYLOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2020, I electronically served the foregoing via ECF on all other parties in this litigation.

/s/ Jose Garza JOSE GARZA

TAYLOR EXHIBIT A GARZA DECLARATION

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,

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RICK PERRY, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR) (Consolidated Action)

Reply Declaration of Jose Garza

I, Jose Garza, submit this Reply Declaration, in accordance with 28 U.S.C. 1746.

- 1. In our original declarations Taylor counsel requested compensation for 1778.7 hours devoted to the case. See Dkt 1144 pp. 5-6. This requested represented a substantial reduction of hours, representing about 28% of the total requested. Thus, the Taylor Plaintiffs' fee application has already been reduced by over \$600,000 precisely because counsel has already exercised billing judgment to account for possible duplication, possible excessive billing etc. For instance, I requested compensation for 472.9 hours spent on the case, while writing off 317 hours in the exercise of billing judgment. (total hours devoted to the cause was 789.9, a reduction of over 40% of my time). In addition, as reflected in the original Motion, Taylor Plaintiffs' did not bill at all for time devoted to the case by several other lawyers and paralegals who assisted in the development of the evidence and records and exhibits. Defendants have proposed additional major reductions, summarized in their Memorandum, pages 93-94, and itemized in their Exhibits E-1 through E-8. I believe the vast majority of these hours are compensable. This Reply Declaration challenges the most clearly unjustifiable of Defendants' proposed cuts.
- 2. Based on our challenges of clearly unjustified cuts, which are spelled out below, and in our

supplemental brief, I believe the maximum justifiable cuts under Defendants' theories would result in a reasonable fee of **\$985,688.60** for the Taylor Plaintiffs. In addition, our requested reasonable rates of \$613.00/hour, \$544.00/hour and \$572.00/hr are reasonable and should form the basis of the lodestar in this case.

- 3. The cuts we challenge are in the following Defendants' categories: Travel (Def. Ex. E-1), Attorney's fees (Def. E-5); Clerical (Def. E-2), Duplicative (Def. Ex. E-3), Business Development (Def's Ex. E-8), Excessive (Def. Ex. E-4), Non-Compensable (Def. Exh. E-5), and Block-Vague Billing (Def. Ex. E-6 and E-7).
- 4. Travel, Def. Ex. E-1. Defendants propose to cut 131.3hrs from Taylor fee request representing travel hours. (26.8 of Doggett travel time; 59.7 of Garza travel time; and 44.8 hrs. of Van Dalen travel time). Yet, the exhibit clearly shows that not only the travel time documented but also other activity claimed in the noted time entries, such as meetings with experts and clients, reviewing discovery with clients, reviewing possible trial testimony etc. are also included in the proposed reductions. (See e.g. Def. E-1, p. 2 Jose Garza entries for 11-22-13 (meeting with experts), 2-6-14 (confer with expert regarding discovery material, prepare potential witness), 9-5-14 (trial). Moreover, the Taylor fee application has already reduced a substancial number of travel time by the no bill entries on their daily time record entries. By our calculations over 212 hours of the no bill entries on our initial fee application were for travel time. Since the Defendants failed to filter out non travel time in their requested reduction and since the Taylor Plaintiffs' fee application already has reduced 212 hours, no additional reduction for travel should be made.
- 5. <u>Attorney's Fees</u>. Defendants proposed cuts of hours (42.1) and rates is more fully addressed the brief in reply to Defendants' Response. It is important to note that many of the hours sought to be reduced on this issue involved a scrutiny of the time entries to reduce the hours claimed. See

Def's Exhibit E-5. There should be no reduction in the amount or rate of compensation for work on the fee application.

- 6. <u>Clerical, Def. Ex. E-2.</u> Defendants propose to cut 25.8 hours described as clerical. However, as with their argument on travel time reductions, the Defendants seek to reduce time entries that include more than potential clerical activities. For example the entries Defendants seek to eliminate include deposition preparation and reviewing trial transcripts in Jose Garza's entries. (See Def. Exh. E-2, p. 001. First, the Court should more accurately evaluate the time claimed as clerical to properly reflect the actual clerical work engaged. No more than 13.5 hours should be designated as such and as described in Taylor's Reply Brief, these hours should not be reduced but rather compensated at a paralegal rate of \$125 per hour.
- Duplicative, Def. Ex. E-3. Defendants propose to cut 86.5 hours as "Duplicative,", but many of Defendants' proposed cuts simply are not duplicative activities. For instance, discussions with Mr. Rosenberg and Ms. van Dalen are not duplicative simply because it involved more than one lawyer. It is important to have case management discussions in multi-party litigation exactly to avoid duplication and to coordinate presentations. Moreover, as noted above, Taylor Plaintiffs' initial fee request includes a substantial billing judgment reduction exactly to account for possible duplication. No further reduction for duplication should be made.
- 8. <u>Business Development, Def. Exh E-8.</u> Defendants propose to cut 29.1 hours of what is referenced as "business development". As detained in our Reply brief, these time entries are not business development for Texas RioGrande Legal Aid, but rather important communications with our clients, fact development and investigation and other legitimate litigation activities. These activities generally should not be reduced. The entry for Mr. Doggett challenged by the Defendants may in fact too general to determine how it was relevant to the development of our client case and

should be reduced. A proper reduction here is 2 hours.

- 5. Excessive, Def. Exh. E-4: Defendants propose to cut 46.5 hours, but this includes a day of actual trial time where I claimed 9 hours for trial, (September 3, 2014). I also spent 2 hours preparing witnesses that day and coordinating with counsel for the next day of trial. Defendants seek to reduce the full entry for that day of 12 hours. Although Defendants' Exhibit F suggests the trial time for that day was 8 hours and 11 minutes, therefore a more reasonable suggested reduction would be no more than 50 minutes. (9hrs claimed v. 8hrs 11min. from Exh. F) but certainly not 12 hours. Moreover, as a lead counsel for the Taylor team, I was present and participated during the first week of trial, including examining and cross-examining witnesses. But I also assisted with the preparation of witnesses, reviewed discovery, did legal research, attend court hearings, etc. Many of the entries described in Exh D-4 involve such activities and were done within the time required to accomplish those tasks. The time claimed is not excessive. My presence at trial and at hearings was also important for later work on drafting post-trial Findings and Conclusions and helping prepare the closing argument. Finally, as noted previously, the Taylor Plaintiff fee application has already discounted a significant amount of time and no further reductions on this issues should be made.
- 6. <u>Block Billing and Vague Billing, Def. Ex. D-6 and D-7</u>: Defendants propose to cut 355.74 hours in these related categories.¹ They do this by applying a 20% reduction, but that percentage is applied to all of our time even though Defendants' Ex. E-6 and E-7 identify Block or Vague Billing on only 10.5 hrs of my 472.9 hrs claimed, 1.2 hrs of Mr. Doggetts time entries and 8.4hrs of Ms. van Dolen's entries. While there are cases supporting a 20% reduction for block or vague

¹ For this category, Defendants' Memorandum, at page 94, states the proposed cut for Block and Vague Billing as a percentage of my overall time claim (20%), which amounts to 355.74 hours.

billing, no cases support applying this figure to the entire time spent on a case except where block or vague billing infects the entire claim (which is not the case here). Applying that 20% cut to all the hours of our time is unreasonable. The time identified by Defendants as Block or Vague Billing would cut 20.1 hours. A more appropriate total for cuts for Black and Vague billing should be at most 20.1 hours.

7. Based on the above, Defendants' cuts should be calculated as follows:

Category	Def. prop cut	Correct Cut
Travel, Def. Exh. E-1	131.3	0
Attorney's Fees	42.1	0
Clerical, Def. Exh. E- 2	25.8	20.8hrs.@\$125.00
Duplicative, Def. Exh. E-3	86.5	0
Excessive, Def. Ex. E-4	46.5	0
Vague and Block, Def. Ex. E-6, E-7	355.74	20.1
Other Defendant cuts, Def. Ex. E-5, E-8		2

Total to reduce

- 8. I therefore request an award of attorneys' fee of \$985,688.60 for the Taylor Plaintiffs.

 Market Rate
- 9. Our expert, Mr. Bill Edwards and I have both testified that a prevailing market rate of \$613.00 per hour, for someone of my background and experience, in this case is reasonable. The Taylor Plaintiffs adopt and rely on the prevailing party argument and authority in the common brief of the Private Plaintiffs. But in addition, as Mr. Edwards has testified, the expertise required to successfully prosecute a Voting Rights Act case such as this, requires some unique experience and expertise. In my estimation in the San Antonio Division of the Western District of Texas there are perhaps four lawyers with that kind of unique experience and background to prosecute a complicated Voting Rights Act case such as this case.

Costs

The TRLA advanced all of the costs and expenses made to properly and effectively prosecute this action. The Taylor Plaintiffs therefore request an award for all costs devoted to

this case, as amended and modified in Taylor Plaintiffs Supplemental Reply Brief in Support of Motion for Attorneys' Fees. These costs include filing fees, service costs, travel associated with development of the evidence, communicating and preparing our clients, as the litigation commence and progressed. Travel associated with the preparation for and presentation of trial, discovery expenses and expert witnesses are legitimate and should be compensated, especially when, as here, other activities were being done during the travel. These were necessary to the proper presentation of our clients' claims in this case. These expenses totaled \$40,094.35 and are evidenced in Exhibits B-G of the Taylor Plaintiffs' Supplemental Brief in Support of Motion for Attorneys' Fees and Costs which are documentation of those expenses as listed in our brief and which are kept in the normal course of business at Texas RioGrande Legal Aid

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/Jose Garza_	
Jose Garza	

TAYLOR EXHIBIT B

TAYLOR PLAINTIFFS (TRLA) OUT OF POCKET EXPENSES VEASEY, et al. v. ABBOTT, et al.

Filing fee and process service fee:

11-21-13: filing fee - \$400.00

12-12-13: process service fee - \$190.00

Subtotal: \$590.00

Expert Expenses:

Testifying expert -

Kevin Jewell - trial prep and trial fees - \$20,692.72

Deposition prep and depo - \$750.00

subtotal: \$21,442.72

Consulting expert –

Leland Beatty - \$10,000.00

Subtotal: \$31,442.72

Travel expenses for client outreach and communication:

9-3-13 through 9-4-13

Robert Doggett – Mileage 522m @ \$.45 = \$234.90 Meals \$60.00

Lodging (1 night) \$119.60

5-21-14 through 6-19-14

Priscilla Noriega – Mileage office to Raymondville

and Sebastian

\$136.80

12-10-13 through 12-11-13

Jose Garza Mileage 631 m @ \$.45 = \$283.95

Meals \$60.00 Lodging \$84.80

12-17-13 through 12-18 Jose Garza	8-13 Mileage 587 m @ \$.45 = Meals	\$264.26 \$60.00
6-25-14 Robert Doggett	Mileage 400m @ \$.45 = Meals Lodging	\$180.60 \$30.00 \$160.95
5-8-17 Jose Garza	Airfare Cab Meals Lodging	\$203.98 \$19.00 \$30.00 \$102.33
Subtotal:	\$2,0	31.17
Travel expenses for deposition	ons, ct. hearings and trial:	
2-11-14 Jose Garza	Mileage 305m @ \$.45 = Meals Lodging	\$137.25 \$30.00 \$114.95
2-11-14 Marinda van Da	len Mileage 388m @ \$.45 = Meals Lodging	\$174.60 \$30.00 no charge
2-11-14 Robert Doggett	Mileage 434m @ \$.45 = Meals Lodging	\$195.30 \$30.00 no charge
3-4-14 through 3-6-14 (Jose Garza	(includes travel for client mee Mileage 594m @ \$.45 = Meals Lodging (2 nights)	\$267.30 \$60.00 \$254.26

3-31-14		
Jose Garza	Mileage 308m @ \$.45 = Meals Lodging	\$138.60 \$30.00 \$126.55
3-31-14 Marinda van Da	len Mileage 388m @ \$.45 = Meals	\$174.60 \$30.00
	Lodging	no charge
5-14-14 through 5-15-1 Marinda van Da	len Mileage 330m @ \$.45 = Meals Lodging	\$148.50 \$30.00 \$90.85
7-17-14 through 7-18-1 Marinda van Da		\$53.48 \$60.00 \$87.74
8-26-14 through 9-10-1 Marinda van Da		\$484.00
8-30-14 through 9-10-1 Marinda van Da		\$411.76
9-4-14 through 9-5-14 (Paula Garza Car	(Trial) Rental (transport client)	\$134.62
8-26-14 (Trial prep) Robert Doggett (Car Rental	\$75.28
9-1-14 (9 nights) (Trial Marinda van Da and Ms. van Dale	len Lodging for expert, clients,	\$1,770.26 \$360.00
12-4-17 through 12-5-1 Jose Garza	7 (oral argument) Airfare Meals	\$146.96 \$60.00
		Page 4 of 5

Cab	\$36.00
Lodging	\$88.60
Airport parking	\$24.00

Subtotal: \$5,855.46

Other Trial Expenses

Interpretation costs for E. Mendez \$175.00

Total out of pocket costs and expenses: \$40,094.35

Taylor Exhibit C

Filing Fees and Service of Process

TEXAS RIOGRANDE LEGAL AID, INC.

OUT-OF-POCKET EXPENSE STATEMENT

#909 Employee incurring expense:	JOSE GARZA	DECEI 11 NOV 14	?III?
Office:	SAN ANTONIO	13 C. W. 13	, .
Amount expense incurred:	11/5/2013 \$400.00	(1,2).	NOV 2 1 2013
Paid to: Pay.Gov (CT Purpose: Application: TX *Receipt must be attached	XSD CM ECF - filing	ter	14 -10-1
Signature of employee. Approved by:	Alex	Date: 11/11/20	13
Amount Paid: Date: Check #: Account:	, \		

TEXAS RIOGRANDE LEGAL AID, INC. 300 S. TEXAS BLVD. (956) 447-4800 383-0841 WESLACO, TEXAS 78566



12/12/2013

PAY TO THE THOMAS PROCESS	\$ ***** 190.00
One Hundred Ninety-& 00/100 Dollars	DOLLARS
· · · · · · · · · · · · · · · · · · ·	TEXAS RIOGRANDE LEGAL AID, INC. VOID AFTER 80 DAYS
	- NON-NEGOTIABLE

MEMO

#093573# #114915272# #00 0907 5#

93573

T0280 THOMAS PROCESS

CK/Dep# 93573

12/12/2013

\$ ***** 190.00

INV#13-007635



NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

TEXAS RIOGRANDE LEGAL AID, INC.

93573

THOMAS PROCESS (T0280) 605 W. 14TH ST. AUSTIN, TX 78701 NON-NEGOTIABLE

TO RECROER, CALL YOUR LOCAL SAFEGUARD DISTRIBUTOR AT 800-221-7419

MEPEON

Q12LR60010000 Y002F002E

V



Thomas Process



605 W. 14th Street Austin, TX, 78701 Phone: (512) 320-8330 Fax: (512) 320-8331 scott@thomasprocess.com

www.thomasprocess.com

Robert W. Doggett

TEXAS RIOGRANDE LEGAL AID, INC.

4820 N. IH 35 Austin, Tx 78751 INVOICE: 13-007635

11/26/2013

Cause No.:

2:13-CV-00348

Crt Date:

Received: 11/25/2013

Completed:

11/25/2013

Job ID:

13-007635

Crt Time:

Reference: Ortiz

3:25 PM

Plaintiff: BELINDA ORTIZ, et al

Defendant: STATE OF TEXAS; JOHN STEEN, in his

Name Srvd STATE OF TEXAS

Location: 1019 Brazos Street, 1st Floor, Austin, Tx 78701

ltem	Qty.	Unit	Total
Fee for Service on c/o Secretary Of State			
STATE OF TEXAS	1	\$70.00	\$70.00
JOHN STEEN, TX SECRETARY OF STATE	1	\$35.00	\$35.00
STEVE MCCRAW	1	\$70.00	\$70.00
Copies Printed for Service	3	\$5.00	\$15.00
		Sub-Total	\$190.00

Total Fees

\$190.00

Payment -

Balance Due



Thank You!

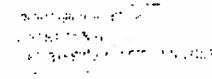
PLEASE INDICATE INVOICE NUMBER ON REMITTANCE

"We Appreciate Your Business"

FEIN: 74-2954951







Taylor Exhibit D

Expert Expenses

Case 2:13-cv-00193 Document 1206-4 Filed on 02/07/20 in TXSD Page 2 of 154742

TEXAS RIOGRANDE LEGAL AID, INC. 300 S. TEXAS BLVD. (956) 447-4800 383-0641 WESLACO, TEXAS 78598



NON AVAILABLE

4/24/2014	
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PAY TO THE ORDER OF KEVIN JEWELL	\$ *****3530.00
Three Thousand Five Hundred Thirty-& 00/100 Dollars	DOLLARS
	TEXAS RIOGRANDE LEGAL AID, INC. VOID AFTER 90 DAYS
	- NON-NEGOTIABLE
МЕМО	

#O94742# #114915272# #OO O907

TEXAS RIOGRANDE LEGAL AID, INC.

94742

J0129 JEWELL, KEVIN

CK/Dep# 94742

4/24/2014

\$ ****3530.00

PROJECT:TRLA VOTER ID:TOTAL 35.3 @ \$100.00=\$3,530.00 PAID S: 2/24-3/31



NON-NEGOTIABLE

94742

JEWELL, KEVIN (J0129) 507 ZENNIA STREET AUSTIN, TX 78751

TEXAS RIOGRANDE LEGAL AID, INC.

NON-NEGOT[ABLE

MSF6001-2

TO REORDER, CALL YOUR LOCAL SAFEGUARD DISTRIBUTOR AT 800-221-7411

G18LR80010000 Y08SF002S34

Detail of Hours for the period 2/24/14 - 3/31/14

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633 Project: TRLA Voter ID

date	hours	detail	
2/24/14	0.5	research	
2/25/14	0.5	client call	
3/4/14	0.5	client call	
3/6/14	3.5	draft report	
3/17/14	3.5	analysis	
3/20/14	5	analysis	
3/21/14	4	analysis	
3/24/14	3	analysis	
3/25/14	4	analysis	
3/26/14	4	analysis	
3/27/14	4	analysis	
3/28/14	2	analysis	
3/31/14	0.8	client call	

Total 35.3
Rate \$100.00
Amount Due \$3,530.00



Case 2:13-cv-00193 Document 1206-4 Filed on 02/07/20 in TXSD Page 4 of 195206

TEXAS RIOGRANDE LEGAL AID, INC. 300 S. TEXAS BLVD. (956) 447-4800 383-0641 WESLACO, TEXAS 78596



6/12/2014

PAY TO THE ORDER OF KEVIN JEWELL

Two Thousand Five Hundred Fifty-& 00/100 Dollars

TEXAS RIOGRANDE LEGAL AID, INC.

TEXAS RIOGRANDE LEGAL AID, INC.

TO THE ORDER OF TOTAL BOLL E

CK/Dep# 95206

MEMO

J0129

#095206# #114915272# #00 0907 5#

95206

TEXAS RIOGRANDE LEGAL AID, INC.

JEWELL, KEVIN

6/12/2014

\$ ****2550.00

PROJECT:TRLA VOTER ID:TOTAL 25.5 @ \$100.00=\$2,550 PAID HRS /2/14-5/22/14



Tarker year

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

95206

JEWELL, KEVIN (J0129) 507 ZENNIA STREET AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours for the period 4/2/14 - 5/31/14

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633 Project: TRLA Voter ID

date	hours	detail
4/2/14	4.0	prepare exhibits
4/3/14	4.5	prepare exhibits
4/4/14	3.5	prepare exhibits
4/7/14	3.5	prepare exhibits
4/8/15		call, followup.
4/10/14		research
4/22/14	1.0	call, followup
4/28/14	1.8	review documents, Mendez video interview.
4/29/14	0.2	client call
5/6/14	1.0	Espinoza video interview.
5/21/14		Laras and M. Lara video interview.
5/22/14		call with counsel, review documents, draft report

Total 25.5
Rate \$100.00
Amount Due \$2,550.00



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Case 2:13-cv-00193 Document 1206-4 Filed on 02/07/20 in TXSD Page 6 of 15





96303

TEXAS RIOGRANDE LEGAL AID, INC. 300 S. TEXAS BLVD. (956) 447-4800 383-0641 WESLACO, TEXAS 78596

NON AVAILABLE

9/30/2014

PAY TO THE ORDER OF KEVIN JEWELL \$ *****5392.72

Five Thousand Three Hundred Ninety-Two & 72/100 Dollars

_ DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC. VOID AFTER 90 DAYS

-Non-Negotiable

MEMO

J0129

#096303# #114915272# #00 0907 5#

96303

TEXAS RIOGRANDE LEGAL AID, INC.

CK/Dep# 96303

9/30/2014

\$ ****5392.72

PROJECT:TRLA VOTER ID 7/1/14-9/8/14

JEWELL, KEVIN

SEP 3 0 2016

NON-NEGOTIABLE

LABOUR MAIN IN

TEXAS RIOGRANDE LEGAL AID, INC.

96303

JEWELL, KEVIN (J0129) 507 ZENNIA STREET AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours For The Period 7/1/14 - 9/8/14

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633 Project: TRLA Voter ID

date	hours	detail
7/16/14	1.0	Review filed reports
7/17/14	1.5	Review filed reports
7/24/14	1.0	Review filed reports
8/1/14	0.6	call with counsel
8/2/14	1.5	Review filed rebuttal reports.
8/19/14	2.0	Milo depo questions
8/25/14	0.5	Review depo transcript.
8/25/14	0.5	Call with counsel.
9/2/14	2.0	Review Milyo depo transcript
9/3/14	0.5	Review report
9/4/14	9.0	Travel, testimony preparation, document review
9/5/14	10.0	Trial, testimony preparation, travel
9/6/14		Testimony preparation
9/7/14		Travel, testimony preparation
9/8/14		Trial, travel

Total 49.1 Rate \$100.00 Hourly Due \$4,910.00

 Mileage
 . 862
 Austin to Corpus x2

 2014 IRS
 0.56

 Mileage Due:
 \$482.72

Total Amount Due \$5,392.72

SEP 3 0 2014

Taller A

Case 2:13-cv-00193 Document 1206-4 Filed on 02/07/20 in TXSD Page 8 of 15 96831

TEXAS RIOGRANDE LEGAL AID, INC. 300 S. TEXAS BLVD. (956) 447-4800 383-0641 WESLACO, TEXAS 78596

NON AVAILABLE

11/20/2014

PAY TO THE ORDER OF **KEVIN JEWELL**

\$ *****750.00

Seven Hundred Fifty-& 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC. VOID AFTER 90 DAYS

IAN NECATIABLE

MEMO

#096831# #114915272# #00 0907 S#

TEXAS RIOGRANDE LEGAL AID, INC.

96831

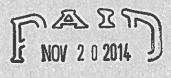
J0129 JEWELL, KEVIN

CK/Dep# 96831

11/20/2014

\$ *****750.00

PROJECT:TRLA VOTER ID 8/13-8/15



Tabarra - same to the "

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

96831

JEWELL, KEVIN (J0129) 507 ZENNIA STREET AUSTIN, TX 78751

NON-NEGOTIABLE

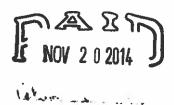
Detail of Hours for 8/15 Deposition

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633 Project: TRLA Voter ID

da	ite	hours	detail	5.6	
	8/13/14	1.5	Compile documents for subpoena		
	8/14/14	4.5	Depo prep		
	8/15/14	1.5	Depo prep and deposition		
	Total	7 .5			
	Rate	\$100.00		2.4	
Amou	ınt Due	\$750.00			



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TEXAS RIOGRANDE LEGAL AID, INC. 300 S. TEXAS BLVD. (956) 447-4800 383-0841 WESLACO, TEXAS 78596



NON AVAILABLE

3/13/2014

PAY TO THE KEVIN JEWELL	\$ *****3620.00
Three Thousand Six Hundred Twenty-& 00/100 Dollars	DOLLARS
	TEXAS RIOGRANDE LEGAL AID, INC. VOID AFTER 90 DAYS
	- NON-NEGOTIAB LE
мемо	

#094343# #114915272# #00 0907

TEXAS RIOGRANDE LEGAL AID, INC.

94343

J0129 JEWELL, KEVIN

CK/Dep# 94343

3/13/2014

\$ *****3620.00

PROJECT: TRLA VOTER ID



NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

94343

JEWELL, KEVIN (J0129) 507 ZENNIA STREET AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours for the period 1/1/14 - 2/18/14

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633 Project: TRLA Voter ID

date	hours	detail	
1/7/14	0.7	client call	
1/13/14	1.0	client call, frame report draft	
1/14/14	0.5	draft client questions	•
1/21/14	1.0	review documents	
1/22/14	0.5	client call	
1/23/14	2.0	review census data	
1/27/14	1.5	review documents	
1/28/14	1.0	client call	
1/30/14	3.5	review data	
2/5/14	2.0	client call, review data	
2/6/14	5.5	draft report, analysis	
2/7/14	3.5	draft report, analysis	
2/10/14	4.5	draft report, analysis	
2/11/14	3.5	client call, draft report	الراجع ج الأ
2/12/14	2.0	draft report, analysis	F MAD 1 2 2011
2/13/14	2.0	draft report, analysis	C MAR 13 ZUR S
2/18/14	1.5	client call, followup	1 4 44

Total 36.2 Rate \$100.00 Amount Due \$3,620.00

Case 2:13-cv-00193 Document 1206-4 Filed on 02/07/20 in TXSD Page 12 of 15





95610

TEXAS RIOGRANDE LEGAL AID, INC. 300 S. TEXAS BLVO. (956) 447-4800 383-0641 WESLACO, TEXAS 78596

TEXAS RIOGRANDE LEGAL AID, INC.

NON AVAILABLE

7/24/2014

PAY TO THE ORDER OF

KEVIN JEWELL

****5600.00

Five Thousand Six Hundred & 00/100 Dollars

_ DOLLARS

MEMO

J0129

#095610# \$114915272# #00 0907 5#

95610

JEWELL, KEVIN

CK/Dep# 95610

7/24/2014

\$ ****5600.00

PROJECT:TRLA VOTER ID 6/1/14-6/27/14



NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

95610

JEWELL, KEVIN (J0129) **507 ZENNIA STREET** AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours for the period 6/1/14 - 6/27/14

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633 Project: TRLA Voter ID

<u>date</u>	hours	detail
6/11/14	6.0	review documents, prepare exhibits
6/12/14	3.5	review documents, draft report
6/13/14	1.5	draft report.
6/20/14	7.5	draft report.
6/23/14	7.0	draft report
6/24/14	5.0	finalize exhibits
6/25/14	8.5	finalize report
6/26/14	10.0	finalize report
6/27/14	7.0	finalize report

Total 56.0
Rate \$100.00
Amount Due \$5,600.00



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Case 2:13-cv-00193 Document 1206-4 Filed on 02/07/20 in TXSD Page 14 of 15

INTER NATIO

96565

TEXAS RIOGRANDE LEGAL AID, INC., 300 S. TEXAS BLVD. (956) 447-4800 383-0641 WESLACO, TEXAS 78596

NON AVAILABLE

10/30/2014

PAY TO THE ORDER OF

LELAND BEATTY

****10000.00

Ten Thousand & 00/100 Dollars

- DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC. VOID AFTER 90 DAYS

MEMO

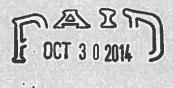
TEXAS RIOGRANDE LEGAL AID, INC.

96565

B0272 BEATTY, LELAND CK/Dep# 96565

10/30/2014

\$ ****10000.00



Where were in the

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

96565

BEATTY, LELAND (B0272) 1103 UPLAND DRIVE AUSTIN, TX 78741

NON-NEGOTIABLE

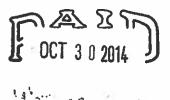
Leland Beatty 1103 Upland Drive Austin, Texas 78741

INVOICE

For services rendered.

- Review of multiple data sets provided in the voter id case
- Analysis for patterns in voters without id
- Preparation and delivery of report on analysis
- Discussion and consultations on various aspects of case and data issues

TOTAL \$10,000



Taylor Exhibit E

Travel Expenses (Clients)

T	RIOGRANDE LEGAL AID, INC.
OUT	TOWN TRAVEL EXPENSE FORM

//20 In	TXSD	Page 2 of .

* Must be complete	ed by the empk	byee and verified and	i approved by Branc	ch Manager wit	hin fifteen (15) worki	ng days after expense was in	curred.
Name: Robe	ert W. Doggett	5.4	1	 1	Office	Austin	
Destination	Coastal Bend	area ·	. FP.	26	File Number	375	VIDO7 V
Purpose of Trip:	Outreach to	Senior Centers of Co	stal Bend to educate	on new voting	requirements	4.	7.
Departed from: Returned to:		Home Austin		f Departure: f Return:		Date Date	9/3/13 9/4/13
Personal Automobi	le Use						Miles Driven
Date] From:	Austin		To: (Edna .		***************************************
_		Beginning	Edna		Ending Victoria offic		156
Date		From:	Victoria office		To: Corpus Chri		
Date	9/4/13	1 Erom:	Corpus Christi Rockport		Finding Rockport To: Sinton; office	Odometer #'s	116
	4. 7. 1		Sinton office	\dashv	Ending Beeville office		63
Date			Beeville office		To: Refugio	5. ⁸	
		 Beginning 	Refugio		Ending Austin	Odometer #'s	187
					Miles are pa Total Al	ld at \$0.45 lowance for Personal Autor	Total Miles 522 5234.90
Air Fare *Receipts required	5 ~ •	DEPARTURE	TIME	FROM	ТО	ARRIVAL	TIME
		DATE	1.5		1 10 20	DATE	11 61
			- A				11 1
			.5		14		
			(6)		D1 125	-24	
		DM TDI A	v pidara in advance	nianne siece	nn V is the following	Total Air Fare Expense	NO.
		DO TRUM PE	y aniare in advance	higgse brace	an X in the following	YES	NO
leal Allowance:			to the second second second				
			DATE(S) of Trip				Cost
					9/03/48) 9/03/48)		\$30.00
					WUNTIS		\$30.00 \$0.00
		Marine Parketon			-		\$0.00
					- €'		\$0.00
					V	1	\$0.00
							\$0.00
						Total Meal Expenses	\$80.00
						A TO MANAGE OF TALL	
odging Allowance:		- Albertal					
Receipts required	,	DATE(S) 9/3/13	# of Nights	1] Night	- I Ov	Amit Per Day \$119.60	Cost \$119.60
		100		Nighta		41.18.00	\$0.00
			11	Nighte	Tax	300	\$0.00
			194,11	Nighta		W	\$0.00
			das En	Night8 Night8			\$0.00 \$0.00
		F. 2		Nighta		* 71	\$0.00
				Nighta			\$0.00
har Evene					Tota	Lodging Expenses	\$119.60
ther Expenses: Receipts required	••	EXPENSES			Date		C=-4
		Cab Fare		122	Dara		Cost
		Car Rental	T	- fe	3 20	, op 9. 9	We will be
		Shuttle	34 B		Contract of	144 2	
		Parking Tips & Incidentals	25		1.0		S
		TO G II CIUSTIMIS			10	<u> </u>	2,577
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			10 DC	CT 1 5 20	113 JJ	Grand Total \$	414.50
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mployee Signature		— q	Pater /		Primary Supervisor	s Signature	Date
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BEST WESTERN PARADISE INN

6301 SOUTH PADRE ISLAND DRIVE CORPUS CHRISTI, TX 78412



(361) 992-3100

09/04/2013 08:30 AM

DOGGETT, ROBERT WAYNE 4308 BELLVUE AVENUE

Registered To:

AUSTIN, TX 78756

(512) 374-2725

Room # 234-A

Conf #

42471

Arrival

09/03/13 09/04/13

Departure

Room Type QQNS-2 QUEEN

Guests

2/0

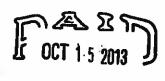
Payment

Visa/Master

Acct

XXXX-XXXX-XXXX-9651

Posting	Oper	AcctCo	Description	From	Reference	Amount
09/03/13	Karen	RC	ROOM CHRG REVENUE			\$104.00
09/03/13	Karen	9C	CITY TAX			\$9.36
09/03/13	Karen	915	STATE TAX			\$6.24
09/04/13	Karen	VS	PAYMENT VISA/MC		9651 - 00667D	\$119.60-
					Balance Due	\$0.00



141,000

THE UNDERSIGNED GUEST AGREES TO PAY THE AMOUNT INDICATED ON THE BALANCE DUE PORTION OF THIS INVOICE. IF THE CHARGES ARE TO BE BILLED TO A THIRD PARTY, THE UNDERSIGNED AGREES TO BE PERSONALLY LIABLE FOR PAYMENT

OF THE CHARGES IN THE EVENT THAT THE INDICATED THIRD PARTY, PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF SUCH CHARGES.

Case 2:13-cv-00193 Document 1206-5 Page 4 of 14 Filed on 02/07/20 in TXSD ACCT: NO: Name * Must be completed by the employee and verified and approved by Branch Manager within fifteen (15) working days after expense was incurred 1 - Client Services (include case #) Use the following codes and briefly explain. FOR ACCOUNTING USE ONLY Community Education **TOTALS** 5/30/14 5/21/14 | 1.07-10592 DATE 5/28/14 4 **Employee Signature** 1, 07-10597 Priscilla Noriega certify that the amounts and attachments claimed on this statement are true and correct and that payment of the amount claimed has not been received. 07-10591 (case number) PURPOSE * BRW BRW BRW DESTINATION 4 - Administration 3 - Training in service area Raymondville Raymondville Raymondville e a neighbor JUN - 3 2014 AUT NO. **R/T-Round Trip た一か Please read the following statement and check the box if you agree OW: 3 끅 괴 LOCAL TRAVEL MILEAGE REIMBURSEMENT FORM 끅 9 "O/W -One Way 8:30 a.m. 2:30 p.m. 8:30 a.m. 1:30 p.m. 7:30 a.m. TEXAS RIOGRANDE LEGAL AID, INC Depart TRIP TIME 1:30 p.m. ***Total time spend away from home or office Primary Supervisor's Signature HOURS TOTAL o Ç O PER €0 4 44 ₩ 6 49 4A ₩ DIEM 137,826 137,931 137,692 137,794 137,952 138,049 ODOMETER READINGS \$ Office 5 End TOTAL MILEAGE EXPENSES Brownsville Date Miles are paid at **** If applicable 105.00 97.00 102.00 40 Q AMOUNT 136.80 43.65 45.90 47.25

901	C
- Men	4

Account No:_

F-TOWN TRAVEL EXPENSE FORM

4	
- (

* Must be completed by the employee and verified and approved by Branch Manager within fifteen (15) working days after expense was incurred. Office SAN ANTONIO Destination Edinburg to Sebastia to Raymondville to Harlingen to Weslaco & SA File Number VID 07 and NIX 08 Purpose of Trip: Trial preparation on these two cases with Attorneys. Departed from: Home Office Time of Departure: 7:50 a.m. 12/10/13 Date 5:00 p.m. Returned to: Home Office Time of Return: 12/11/13 Date Personal Automobile Use Miles Driven 12/10/13 Oate To: Home From: Home Beginning 77777 **Ending** 78408 Odometer #'s 631 Date From: To: Beginning **Ending** Odometer#'s From: Date To: Beginning Ending Odometer #'s Ô Date From: To: Ending Beginning Odometer #'s O Miles are paid at \$0.45 **Total Miles** 631 Total Allowance for Personal Automobile Use \$283.05 Air Fare "Recaipts required" DEPARTURE ARRIVAL TIME **FROM** TO TIME DATE DATE ot Applicable Total Air Fare Expense Did TRLA pay airfare in advance, please place an X in the following YES NO Х Meal Allowance: DATE(S) of Trip 12/10/13 \$30.00 12/11/13 \$30.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 30 \$0.00 Total Meal Expenses \$60,00 Lodging Allowance: "Receipts required" # of Nights Amt Per Day 12/10/13 Night&Tax \$84.80 \$84.80 Night&Tax \$0.00 Night&Tax \$0.00 Night& Tax 50.00 Night& Tax \$0.00 Night& Tax \$0.00 Night&Tax \$0.00 \$0.00 Total Lodging Expenses \$84.80 Other Expenses: "Receipts required" EXPENSES Dale Cost Cab Fare Car Renta Shuttle Parking Tips & Incidentals (Explain) otal of Other Expenses \$0.00 **Grand Total \$** 428.75 1 9 2013 Amount Claimed; \$ 428.75 Amount Due Traveler: \$ 428.75 ADVANCE RECEIVED: \$ 0.00 Amount Due TRLA: \$ Advance Check Number: (4) war - - -Advanced Airfare: \$ 0.00 I certify that this statement, the attachments and amounts claimed are true, correct, and complete and that payment for the amount claimed has not been received. Employe Primary Supervisor's Signature Dale FOR ACCOUNTING USE ONLY

16 10 mm



105

12-11-13

Jose Garza Folio No. :
7414 Robin Rest Dr A/R Number :
San-Antonio TX 78209-3134 Group Code :
US Company : E

Company : **Business**Membership No. : **PC** 966822935

Description

Departure :
Conf. No. :

Arrival

: 12-10-13: 12-11-13: 63440039

84.80

Rate Code : IDAAA
Page No. : 1 of 1

Room No. : 118

Charges	Credits
75.05	
4.50	
	Charges 75.05

5.25

XXXXXXXXXXX3002

Invoice No.

Thank you for staying at the Holiday Inn Express Weslaco. Qualifying points for this stay will automatically be credited to your account. To make additional reservations online, update your account information or view your statement please visit www. priorityclub.com. We look forward to welcoming you back soon.

Total	84.80	84.80
Balance	0.00	

Guest Signature:

Date

12-10-13

12-10-13

12-10-13

12-11-13

*Accommodation

State Tax - Room

City Tax - Room

American Express

I have received the goods and / or services in the amount shown heron. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the Issuer.

Independently Owned and Operated by RGV Express Limited

DEC 19 2013

Latin ...

Holiday Inn Express Weslaco Hotel and Suites 421 S. International Blvd. Weslaco, TX 78596 Telephone: (956) 973-2222 Fax: (956) 968-9222

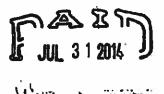
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certify that this statement, the atta	chments and amounts	claimed are true, con	rect/and complete a	and that payment for the	amount claimed has no	ol been received. 💖	ייין אייין אייין
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Employee Sinnatura	7	121/14	/	- la		7/28/1	Ĭ,
Employee Signature	7	121/14	/	Supervisor's Signature		7/28// Date	9
Employee Signature FOR ACCOUNTING USE ONLY		121/14	/	- la		7/28/19 Date	9
•	7	<u> Z1</u> 14	Printary	Supervisor's Signature		7/28/19 Date	9
FOR ACCOUNTING USE ONLY	7a	121/14	Printary	- la		7/28/19 Date	9



121 06-26-14 Folio No. robert doggett Room No. : 0313 A/R Number 4308 belivue avenue Arrival : 06-25-14 **Group Code** Austin TX 78756 Departure : 06-26-14 Company US Conf. No : 2622482 Invoice No. Rate Code : IGCOR Reference No. Page No. : 1 of 1 Description Date Charges **Credits** 139.95 06-25-14 *Room 8.40 06-25-14 State Hotel Tax 06-25-14 City Hotel Tax 12.60 Total 160.95 0.00 160.95 Balance Guest Signature: _

(Owned by Shoreline Hotel Venture LP and Operated by Kirby Hotel Management Co)



I have received the goods and / or services in the amount shown hereon. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or association fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

Emerald Beach Hotel 1102 S. Shoreline Blvd Corpus Christi, TX 78401 Telephone: (361) 883-5731 Fax: (361) 883-9079 Case 2:13-cv-00193 OF COMPTRAVE FORM on 02/07/20 in TXSD Page 10 of 14

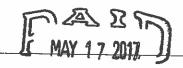
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From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>

To: garzpalm <garzpalm@aol.com>

Subject: Flight reservation (5QB344) | 08MAY17 | AUS-HRL | Garza/Jose

Date: Fri, May 5, 2017 4:08 pm



Thanks for choosing Southwest® for your trip.

Log in | View my itinerary

Southwest .

Check In Online

Check Flight Status

Change Flight

Special Offers

Hotel Offers

Car Offers

Ready for takeoff!



Thanks for choosing Southwest® for your trip. You'll find everything you need to know about your reservation below. Happy travels!



Air itinerary

AIR Confirmation: 5QB344

Confirmation Date: 05/5/2017

Passenger(s)

Rapid Rewards # Ticket #

Expiration

Est. Points Earned

GARZA/JOSE

704266

5262102798478

May 5, 2018 1059

Rapid Rewards points earned are only estimates. Visit your (MySouthwest, Southwest.com or Rapid Rewards) account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date

Flight

Departure/Arrival

Mon May 8

Depart AUSTIN, TX (AUS) on Southwest Airlines at 3:00 PM Arrive in HARLINGEN, TX (HRL) at 4:00 PM

Travel Time 1 hrs 0 mins

- Check in for your flight(s): 24 hours before your trip on Southwest.com or your mobile device to secure your boarding position. You'll be assigned a boarding position based on your check-in time. The earlier you check in within 24 hours of your flight, the earlier you get to board.
- Bags fly free®: First and second checked bags. Weight and size limits apply. One small bag and one personal item are permitted as carryon items, free of charge.
- 30 minutes before departure: We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.
- 10 minutes before departure: You must obtain your boarding pass(es) and be in the gate area for boarding at least 10 minutes prior to your flight's scheduled departure time. If not, Southwest may cancel your reserved space and you will not be eligible for denied boarding compensation.







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- Best rate guarantee
- Free cancellation

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Add a rental car

- Earn Rapid Rewards* points
- Guaranteed low rates
- Free cancellation



If you do not plan to travel on your flight: In accordance with Southwest's No Show Policy, you must notify Southwest at least 10 minutes prior to your flight's scheduled departure if you do not plan to travel on the flight. If not, Southwest will cancel your reservation and all funds will be forfeited.

Need to make a change? Keep your confirmation number on record. It will be used to retrieve your reservation and apply funds to future travel.

Air Cost: 203.98

Fare Rule(s): 5262102798478: NONTRANSFERABLE/AGE 65 OR OVER/ID REQUIRED.

Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

AUS WN HRL176.54QCD 176.54 END ZPAUS XFAUS4.5 AY5.60\$AUS5.60



Learn about our boarding process



Travel more for less. Exclusive deals for your favorite destinations. Sign up and save

Southwest

Rapid Rewards

- Unlimited reward seats
- No blackout dates
- Redeem for International flights and more

Enroll now >

Cost and Payment Summary

X AIR - 5QB344

Base Fare **Excise Taxes** 176.54 Payment Information

13.24

Payment Type: Amer Express XXXXXXXXXXXX3002

Traveling with Children

Unaccompanied Minors

Customers with Disabilities

Traveling with Pets

Baby on Board

Segment Fee

4.10 Date: May 5, 2017

Passenger Facility Charge September 11th Security Fee

4.50 Payment Amount: \$203.98 5.60

Total Air Cost 203.98

Useful Tools

Check In Online

Early Bird Check-In

Mew/Share Itinerary

Know Before You Go

In the Airport

Baggage Policies

Suggested Airport Arrival Times

Change Air Reservation

Security Procedures

Cancel Air Reservation

Customers of Size

Check Flight Status

In the Air

Flight Status Notification

Purchasing and Refunds

Book a Car Book a Hotel

Legal Policies & Helpful Information

Privacy Policy

Notice of Incorporated Terms

FAQs

Special Travel Needs

Customer Service Commitment

Contact Us

Book Air | Book Hotel | Book Car | Book Vacation Packages | See Special Offers | Manage My Account

Country Inn And Suites By Carlson Harlingen, Tx

3825 South Expressway 83, Harlingen, Texas 78550

Your Reservation Receipt

Booking Number WF9F9K8

Guest Name Jose Garza

Check In Monday, May 8, 2017 @ 3:00 PM

Check Out Tuesday, May 9, 2017 @ 11:00 AM

Room Type Double Occupancy Room, Assigned By Hotel At Check In

Length of Stay 1 Night

Cancellation Policy

Immediately upon confirmation, this booking is completely non-refundable. Changes without penalty are also not guaranteed.

Payment and Rate Information

Average Room Cost Per Night \$91.00 USD

Total Room Cost for 1 Night \$91.00 USD

Payment Information

Taxes & Fees \$11.33 USD

Total Charges \$102.33 USD

Important Information

Minimum age for check in is 21 years old with a valid ID and credit card. No-show is subjected to full charge penalty.

Card AMEX ending in 3002

Status Confirmed - paid in full on 07 May 2017

The above charges will appear on your card from RTI*SWHotels Country Inn

MAY 17 2017

RECEIPT DATE	No. 392349 Transportation \$ 19.00 DAN 17 DOLLARS
OFOR RENT VAXU	E MAY 1 7 2017
ACCOUNT PAYMENT /9 00 CASH ORDIN BAL. DUE O CREE CARE	

MAY 17 2017

Taylor Exhibit F

Travel Expenses (Depositions, Hearings, Trial)

9019		ou	RIOGRANDE LEGAL DWN TRAVEL EXPI	ENSE FORM		
Name: Jose Garza Destination Corpus Christ		approved t	y Branch Manager V	Office File Numbe	king days after expense was incurre San Antonio	VID O7
Purpose of Trip: Court Hearing Departed from: X Returned to: X	Home	Office Office	Time of Departure: Time of Return:	6:00 a.m, 6:00 p.m.	Date Date	2/11/14 2/12/14
Personal Automobile Use Date 2/11/14 Date 2/12/14 Date Date	Beginning	San Antonio	14958		15110 Odometer #'s	
Air Fare **Receipts required**	DEPARTURE DATE	TIME	FROM	то	ARRIVAL DATE Total Air Fare Expense	TIME ·
Meal Allowance:	Did TRLA per	y airfare in a		02/11/14 02/12/14	g YES	Cost \$30.00 \$30.00 \$50.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00
Lodging Allowance: "Receipts required"	DATE(S) 2/11/14	# of 1	Nigt Nigt Nigt Nigt Nigt Nigt	It&Tax	Amt Per Day \$114.95	\$50.00 Cost \$114.95 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00
	EXPENSES Cab Fare Car Rental Shuttle Parking Tips & Incidentals (Explain)			Date	Other Expenses	\$114.95 \/ Cost
Amount Claimed: \$ ADVANCE RECEIVED: \$ Advance Check Number: " Advanced Airfare: \$	312.38 0.00 0.00		FEB 2.7		Grand Total \$ Amount Due Traveler: \$ Amount Due TRLA: \$	312.38
Employee Signature FOR ACCOUNTING USE ONLY Account No:		of the claimed and the claimed		Primary Superviso Account No: Account No:	rs Signature DECEIVI	Date

Emerald Beach Hotel

02-12-14

N/A Jose Garza 7414 Robin Rest Dr. san antonio TX 78209 US

Guest Signature: _

Folio No. A/R Number Group Code Company Invoice No.

Room No.: 0617 Arrival Departure : 02-12-14 Conf. No

: 02-11-14 : 2452953

Reference No.

Rate Code : IGBAR Page No. : 1 of 1

Date	D	escription	Charges	Credits
02-11-14	*Room		99.95	
02-11-14	State Hotel Tax		6.00	
02-11-14	City Hotel Tax		9.00	
		Total	114.95	0.00
		Balance	(114.95	

(Owned by Shoreline Hotel Venture LP and Operated by Kirby Hotel Management Co)



I have received the goods and / or services in the amount shown hereon. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or association fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

> **Emerald Beach Hotel** 1102 S. Shoreline Blvd Corpus Christi, TX 78401 Telephone: (361) 883-5731 Fax: (361) 883-9079

11/04	TEXA	S RIOGRANDE LEGAL A TOWN TRAVEL EXPE				1
* Must be completed by the empl	oyee and verified and approve	d by Branch Manager wi	thin fifteen (15) working	g days after expense was incurre	d	
	sti TX- US Court		Office (E	prownsville	VID07	10/
Departed from: Returned to:	Home X Office	Time of Departure: Time of Return:	1:00 PM] 4:30 PM]	Date !	2/11/14 2/12/14	
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	Shuttle Parking					
	Tips & Incidentals			2000		
	(Explain)	286		ther Expenses	\$0.00	
		الداجيج ج	الس	Grand Total \$	234.60	
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Advanced Airtage:	0.00	141-15	Ä,	, *	v	0
Certify that this statement the ap	schments and amounts claime	are true, correct, and o	complete and that payn	nent for the amount claimed has	not been received.	\mathcal{L}
Employee Signature FOR ACCOUNTING USE ONLY	Date	- 1 (, 1	Primary Supervisor	Signature	Dale Tale	
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Account No:			Account No:	## FEB 2 1 201	<u> </u>	

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	L			14 100	Total Meal Expenses	\$0.00 \$0.00
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1			Night&Ta)			\$0.00
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	Car Rental Shuttle			·		
	Parking					
	Tips & Incidentals		/			
I	(Explain)	/				
	, 12×5×5×7			Total of C	ther Expenses	\$0.00

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are						al Miles 594 Sille Use \$207,12
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	Did TRLA pa	y airfare in a	advance, please place	an X in the following	g YES	NO
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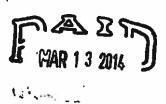
30 03-05-14

Folio No. Jose Garza Room No. : 809 7414 ROBIN REST DR A/R Number Arrival : 03-04-14 Corpus Christi Tx **Group Code** Departure : 03-05-14 San Antonio TX 78209 Company : Lesiure Conf. No. : 65992169 **United States** Membership No.: Rate Code: IDAAA Invoice No. Page No. : 1 of 1

Date	Description		Charges	Credits
03-04-14	*Accommodation		139.00	
03-04-14	State Occupancy Tax		8.34	
03-04-14	City Occupancy Tax		12.51	
03-04-14	Parking		10.00	
03-05-14	American Express			169.85
		Total	169.85	169.85
		Balance	0.00	

Guest Signature:

I have received the goods and / or services in the amount shown heron. I agree that my flablity for this bill is not walved and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.



Holiday Inn Marina 707 North Shoreline Boulevard Corpus Christi, TX 78401 Telephone: 361-882-1700 Fax:361-882-3113



105

03-06-14

Jose Garza 7414 Robin Rest Dr San-Antonio TX 78209-3134 Folio No. A/R Number

: 03-05-14 03-06-14

112

United States

Group Code Company

: TEXAS RIO GRANDE LEGAL AID

Departure : Conf. No. : 66874843 Rate Code: IDOTH

Invoice No.

Membership No.: PC 966822935

Page No. : 1 of 1

Room No. :

Arrival

Date	Description		Charges	Credits
03-05-14	*Accommodation		74.70	
03-05-14	State Tax - Room		4.48	
03-05-14	City Tax - Room		5.23	
03-06-14	American Express			84.41
	XXXXXXXXXXX3002			
automatica	for staying at the Holiday inn Express Weslaco . Qualifying points for this stay will lly be credited to your account. To make additional reservations online, update	Total	84.41	84.41
	int information or view your statement please visit www. priorityclub.com. We do welcoming you back soon.	Balance	0.00	

Guest Signature:

I have received the goods and / or services in the amount shown heron. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

Independently Owned and Operated by RGV Express Limited

Holiday Inn Express Weslaco Hotel and Suites 421 S. International Blvd. Weslaco, TX 78596 Telephone: (956) 973-2222 Fax: (956) 968-9222

	ONK	<u> </u>	0	TOWN TRAV	EL EXPEN	SE FORM	(_		
* Must be complet	ted by the empl	dyee and verified a	nd approved	by Branch M	anager with	in fifteen (15) w	orking days	after expense was i	ncurred,		
	E GARZA				_	Office	SAN AN	ITONIO			
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Air Fare	. Joo										
Receipts require	3a	DEPARTURE DATE	TIME	FR	ОМ	TO		ARRIVAL DATE	TIM	Ε	
		Did TRLA	pay airfare in	advance, plea	ase place a	n X in the follow	Tötal Ai	r Fare Expense YES	NO		
Meal Allowance:							•				
			DATE(S	s) of Trip	03	/31/14	,	40	Cos	\$30.00	
						/01/14	e.	1		\$30.00	
			·			0.200		1 11 1		\$0.00	
										\$0.00 \$0.00	
										\$0.00 \$0.00	
Lodging Allowance	2 -						100	al Meal Expenses	L	\$60.00 v	
**Receipts require		DATE(S)		Nights			Aml Pe		Cos	<u> </u>	
		3/31/1	4		Night& Night&	ax		\$126.55		\$126.55 \$0.00	
					Night& Night&	ax				\$0.00 \$0.00	
					Night&	ax				\$0.00 \$0.00)
					Night&					\$0.00 \$0.00	
Other Expenses:				>>			Total Lodging	Expenses		\$126.55	
**Receipts require	d	EXPENSES Cab Fare				Date			Cos		
		Car Rental Shuttle	 								
	,	Parking Tips & Incidentals									
		(Explain)		3		· · · · · · · · · · · · · · · · · · ·		-	·		
					73.	Total	of Other Ex	penses		\$0.00	
			3.	ano	4 - 004	. 11		Grand Total \$		325.15	
ADVANCE	unt Claimed: \$ RECEIVED: \$ heck Number:	325.18 0.00		T WAK	1 5 201	4 9		t Due Traveler ; \$ unt Due TRLA : \$		325.15	الوالة
Advar	nced Airfare: \$	0.00	<u>Γ</u>	المالية							11/2
l mandili shaa shii								۸ ۱			
r certify that this sta		achments and amo			ect, and co	mplete and that	payment for	The amount claime	d has not been	received.	
Employee Signatur	e W	 _	U-51	4	7	rimary Supervis	Sor's Signatu	ile /	Da	ile	
FOR ACCOUNTING	G USE ONLY	77				• 1/5	,	1		-	
Account No: Account No:	<u>.</u>		•			Account N		<u> decei</u>	, ৺ হি ∭		
ACCOUNT NO:	 -		==			Account N	o:	M APP 1 A	M Arre		



04-01-14

Room No. : 516 Jose Garza Folio No. 7414 Robin Rest Dr. Arrival : 03-31-14 A/R Number San Antonio Tx Departure : 04-01-14 **Group Code SAN ANTONIO TX 78209** : LEISURE Conf. No. : 64818633 Company **United States** Rate Code: Membership No.: **IMGOV** Invoice No. Page No. : 1 of 1

Date		Description	Charges Credits
03-31-14	*Accommodation	-	97.00
03-31-14	State Occupancy Tax		5.82
03-31-14	City Occupancy Tax		8.73
03-31-14	Valet Parking		15.00
03-31-14	American Express		126.55
			Total (126.55) 126.55
			Balance 0.00

Guest Signature:

I have received the goods and / or services in the amount shown heron. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.



1 4 martin minutes of the second



Holiday Inn Marina 707 North Shoreline Boulevard Corpus Christi, TX 78401 Telephone: 361-882-1700 Fax:361-882-3113

Case 2:13-cv-00193 Document 1206-6 Filed on 02/07/20 in TXSD Page 11 of 33 TEXAS RIOGRANDE LEGAL AID, INC. TOWN TRAVEL EXPENSE FORM en ployee and verified and approved by Branch Manager within fifteen (15) working days after expense was incurred. Must be completed by the Name: Marinda van Dalen Office Brownsville VID07 Corpus Christi TX- US Court Destination File Number Purpose of Trip: Status Conference Hearing - Home 12:00 PM, Departed from: Office Time of Departure: Date i 3/31/14 Returned to: Home Office Time of Return: 9:00 PM Date! 4/1/14 Miles Driven Personal Automobile Use 3/31/14 From: |Brownsville To: Rock Port, TX Date ." 194 Beginning 1 Ending Odometer #'s 4/1/14" From: Rock Port, TX To: Brownsville Date Beginning **Ending** Odometer #'s 194 From: To: **Ending** Odomeler #'s Beginning Date From: To: Ending Beginning Odometer #'s Miles are paid at \$0.45 **Total Miles** 38B Total Allowance for Personal Automobile Use \$174.60 Air Fare "Receipts required" DEPARTURE ARRIVAL TIME **FROM** TO TIME DATE DATE Total Air Fare Expense Did TRLA pay airfare in advance, please place an X in the following YES! NO Meal Allowance: DATE(S) of Trip 03/31/14 \$30.00 04/01/14 \$30.00 \$0.00 \$0.00 \$0.00 \$0,00 \$0.00 \$0.00 Total Meal Expenses \$60.00 **Lodging Allowance:** **Receipts required** DATE(S) # of Nights Amt Per Day Night&Tax \$0.00 Night&Tax \$0.00 Night&Tax \$0.00 Night&Tax \$0.00 Night&Tax \$0.00 Night&Tax Night&Tax \$0.00 \$0.00 Night&Tax \$0.00 Total Lodging Expenses \$0.00 Other Expenses: ""Receipts required" EXPENSES Date Cost Cab Fare Car Rental Shuttle Parking Tips & Incidentals (Exptain) Total of Other Expenses \$0.00 **Grand Total \$** 234,60 Amount Claimed: \$ 234.60 234.60 Amount Due Traveler: \$ **ADVANCE RECEIVED: \$** 0.00 Amount Due TRLA: \$ Advance Check Number: Advanced Airfare: \$ ttachments and amounts claimed are true, correct, and complete and that payment for the amount claimed has not been received. Employee Signature Date Primary Supervisor's Signature FOR ACCOUNTING USE ONLY

Account No:_ Account No:_

Account No:

Account No:

Case 2:13-cv-00193 POSINDERIND 2006 FORM
OUT TOWN TRAVEL EXPENSE FORM

* Must be completed by the emptoyee and verified and approved by Branch Manager within fifteen (15) working days after expense was incurred. Nama: Marinda van Dalen Brownsville Destination Corpus Christi TX- US Court File Number Status Conference Hearing Purpose of Trip: Departed.from: Office Time of Departure: Home Date 5/14/14 Returned to: Office Time of Return: Home Date 5/15/14 Personal Automobile Use Miles Driven Date From: Brownsville To: Corpus Christi TX **Beginning Ending** Odometer #'s 165 Date From: Corpus Christi TX To: Brownsville Beginning **Ending** Odometer #'s Date From: To: Beginning Ending Odometer #'s From: Date To: Beginning Ending Odometer #'s ō Miles are paid at \$0.45 **Total Miles** 330 Total Allowance for Personal Automobile Use \$148.50 Air Fare "Receipts required" DEPARTURE ARRIVAL TIME **FROM** TIME DATE DATE Total Air Fare Expense Did TRLA pay airfare in advance, please place an X in the following YEŞ NO Meal Allowance: DATE(S) of Trip 05/14/14 \$0,00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 30 \$0.00 otal Meal Expenses \$30.00 Lodging Allowance: **Receipts required** Amt Per Day Night&Tax \$90.85 \$90.85 Night&Tax \$0.00 Night&Tax \$0.00 Night&Tax \$0.00 Night&Tax \$0,00 Night&Tax Night&Tax \$0.00 \$0.00 Night&Tax \$0.00 Total Lodging Expenses \$90.85 Other Expenses: "*Receipts required" EXPENSES Date Cost Cab Fare Car Renta Shuttle Parking Tips & Incidentals (Explain) Total of Other Expenses \$0.00 **Grand Total \$** 269.35 Amount Claimed: S 269.35 Amount Due Traveler: \$ ADVANCE RECEIVED: \$ 0.00 Amount Due TRLA: \$ Advance Check Number: Advanced Airlare: \$ 0.00 I certify that this staff eals and amounts claimed are true, correct, and complete and that payment for the amount claimed has not been received. Employee Signature Primary Supervisor's Signature FOR ACCOUNTING USE ONLY Account No:_ Account No: Account No:_ Account No:

Commence of the Second



SUPER 8 CORPUS CHRISTI

411 N. SHORELINE BLVD. CORPUS CHRISTI, TX 78401 US Phone: (361) 884-4815

Fax: (361) 884-3111 Email: super8bf@yahoo.com Printed: 5/15/2014 7:36:34 AM

Folio (Detailed)

Name:

VANDALEN, MARINDA O

Confirmation Number:

16692450

Account Number:

987-610779

Address:

207 E WASHINGTON ST

BROWNSVILLE, TX 78520 US

Room:

206

Room Type:

NQ1, 1 QUEEN NSMK

Nights:

1

Guests: 1/0

Rate Plan: Arrival:

RACK

Daily Rate: Departure:

\$79.00 + \$11.85 Tax 5/15/2014 (Thu)

GTD:

VI - VISA

XXXX XXXX XXXX 8272

Room Rate:

5/14/2014 (Wed) - 5/14/2014 (Wed)

5/14/2014 (Wed)

\$79.00 + \$11.85 Tax per night.

Date	Code	Description	Amount	Balance
5/14/2014	RM	ROOM CHARGE	\$79.00	\$79.00
5/14/2014	TAX1	STATE TAX	\$4.74	\$83 <u>.74</u>
5/14/2014	TAX2	CITY TAX	\$7.11	\$90.85
5/15/2014	VI	VISA	(\$90.85)	\$0.00
		XXXXX XXXXX XXXXX 8272	•	·

Summary						
Room	Tax	F&B	Other	CC	Cash	DB
\$79.00	\$11.85	\$0.00 	\$0.00	(\$90.85)	\$0.00	\$0.00

By signing below, I agree to these terms and conditions.

Guest Signature:

[&]quot;We or our affiliates may contact you about goods and services unless you call 888-946-4283 or write to Opt Out/Privacy, Wyndham Hotel Group, LLC, 22 Sylvan Way, Parsippany, NJ 07054 to opt out. View our website about privacy."



⁽¹⁾ Regardless of charge instructions, the undersigned acknowledges the above as personal indebtedness. (2) This property is privately owned and management reserves the right to refuse services to any one, and will not be responsible for injury or accidents to guests or loss of money, jewelry or any personal valuables of any kind.

Case 2:13-cv-00193 Document 1206-6 Filed on 02/07/20 in TXSD Page 14 of 33

: Marinda van Dale			Office	Brownsville	
nation Corpus Chi use of Trip: Depo perp	risti meeting & Depo of Lenard	Taylor	File Numb	er	VIDE
rted from:	Home X Off	ice Time of Departure	9: 6:30 P	30 Date Date	7/17/1
onal Automobile Use					Miles Drive
Date	From: [" Beginning		To: Ending	Odometer #'s	- 0
Date	From: 1		To: Ending	Odometer #'s	: 0
Date	From		To:		
Date	Beginning i From:		Ending (Odometer #'s	0
	Beginning		Ending Miles are	paid at \$0.45 To	otal Miles 0
				Allowance for Personal Automo	
e ipts required**	DEPARTURE			ARRIVAL	
ipto required	DATE	TIME FROM	то	DATE	TIME
	Did TRI A pay a	irfare in advance, please pli	are an X in the following	Total Air Fare Expense	NO
llowance:	2/2 (W2 (pc) c)	and an an and produce pri		1201	1101
OWAII CO.		DATE(S) of Trip	125%	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	Cost
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			1.00	ria de la F	\$0.0 \$0.0
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			In the second	Total Meal Expenses	\$0,0
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ipts required** ·		1 Ni Ni Ni Ni Ni Ni	ght&Tax ght&Tax ght&Tax ght&Tax ght&Tax ght&Tax ght&Tax ght&Tax	Amt Per Day	\$0.0 \$60.0 Cost \$87.7 \$0.0 \$0.0 \$0.0 \$0.0
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800004598894	900004901416	500004854544	550004802582	900004890945	650004379263	900004817477	800004528465	750004725300	500004831857	750004647838	500004743941	650004464946	500004633061	700004668904	90060399834	90060397876	90060128740	90060088451	r 863927 TEXAS	Account Number	nt-A-Car	Bill Ref#	KANSAS CITY, MO 64184-0173 For Billing Inquiries (866) 278-9894 ARINQUIRY@EHI.COM
7445-48-07-86	1445-39-2001	DA12-43-0PI	17445-39 wo	-			+	1415-13-00-01 NIXE	1 Jair 87-Shill		Г	1445-22-0001	10-108h -5hM	So 00.58 .5 461.	17/5- 2000/02	7495-20001/02	745 39 apri	7445-48-01-R3	ling Number 863927 TEXAS RIO GRANDE LEGAL AID	Contract ID / Account Number K10265D TEXAS RIO GRANDE LEGAL AID		External Customer Ref#	73
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REED, MARY CHRISTING	DONALDSON, SARAH	FLORES, FABIOLA	GUERRA, MONICA	BONE, POLLY	GARZA, PAULA	MEDINA, VERONICA	O'ROURKE, ERIN	RIOJAS, JAVIER	DOGGETT, ROBERT	RIOJAS, JAVIER	RAMOS, ROMAN	VAN DALEN, MARINDA	DOGGETT, ROBERT	BELTRAN, MARIA	WYATT, MICHAEL	CARRASCO, RAFAEL	NORIEGA, RAUL	JONAS, STACIE			1	Renter	Alamo Onterpriso Neathard
Alla	SAN	AUST	SAN	SAN	BRO	SAN	NASH	EAGI	AUS.	EAG	LARE	BRO	AUS.	NAS	SAN	SAN	HAR	NEV			4	N'98.	⁹ 2014 J
AIISTIN TY	SAN ANTONIO, TX	AUSTIN, TX	SAN ANTONIO, TX	SAN ANTONIO, TX	BROWNSVILLE, TX	SAN ANTONIO, TX	NASHVILLE, TN	EAGLE PASS, TX	AUSTIN, TX	EAGLE PASS, TX	LAREDO, TX	BROWNSVILLE, TX	AUSTIN, TX	NASHVILLE, TN	SAN ANTONIO, TX	SAN ANTONIO, TX	HARLINGEN, TX	NEWARK, NJ				Rental Location	Rental Summary Consolidate II.v. #: 3331017 Consolidated Inv. Date: 20-Sep-2014
00/11/14	09/11/14	09/11/14	09/09/14	09/09/14	09/04/14	09/04/14	09/04/14	09/02/14	08/30/14	08/27/14	08/27/14	08/26/14	08/26/14	08/25/14	09/19/14	09/19/14	09/10/14	09/07/14	The same of the sa			Rental Date	v. #: 3331017
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1	37.36	37.36	177.05	74.73	134.62	74.37	262.64	91,81	411.76	76.85	429.77	484.00	75.28	97.45	46.69	80.87	81.90	154.68				Amount Due	



For Billing Inquiries (866) 278-9894 ARINQUIRY@EHI.COM		A	Alamo - Enterprise Metional				
Fed Tax Id: 430724835				Consolidated Inv. #: 3331017 Consolidated Inv. Date: 20-Sep-2014	. #: 3331017 . Date: 20-Sep-	2014	
Rental Agreement # Bill Ref# External	External Customer Ref#	Reservation Number	Renter	Rental Location	Rental Date	Return Date	Amount
Enterprise Rent-A-Car							
8FK72Y 900004923225 17445-47210	82-59724 TNYRYH	TNYRYH	WELCH, STEPHANIE	EL PASO, TX	09/11/14	09/12/14	53.05
23TW 750004894334 7465-4320	200	8F3J0V	ESTRADA-RIOJAS, IRASEMA	EAGLE PASS, TX	09/15/14	09/16/14	42.34
8GDYRK 500004963618 1415-41-01-0		JQCRFS	GARZA, ROBERT	AUSTIN, TX	09/16/14	09/19/14	175.21
K10265D TEXAS RIO GRANDE LEGAL AID - Billing Number 863927	mber 863927			Grand Total in USD			3,174.52
Enterprise Rent A Car Grand Total For Account Number TEXAS RIO GRANDE LEGAL AID in USD	nber TEXAS RIO	GRANDE LEG	AL AID in USD				3,174.52

EAN SERVICES, LLC PO BOX 840173 KANSAS CITY, MO 64184-0173

TEXAS RIO GRANDE LEGAL AID Rental Summary







Fed Tax Id: 430724835

Document 1206-6 File on solidated 10 vin #TXSD Page 17 of 38331017 Rental Agreeme 8CYC4L

Bill Ref # Invoice Date 8CYC4L 650004379263 20-Sep-2014

Bill To Information

TEXAS RIO GRANDE LEGAL AID

300 S TEXAS

WESLACO, TX - 78496

Rental Information

Reservation Number: 8CQVHD

Driver: GARZA, PAULA

Additional Driver: NORIEGA, PRISCILLA Pickup Date/Time: 09/04/2014 14:54 Return Date/Time: 09/05/2014 18:01

Miles/kms: 348

Car Class: MVAR

Requested Class: MVAR

Vehicle InformationYr/Make/ModelVINLicense NoBeg/End/Distance2014/DODGE/GCAER127855CGZ711434981/35329/348Rental Branch

BROWNSVILLE HWY 77 4177 EXPRESSWAY 83 BROWNSVILLE, TX - 78520

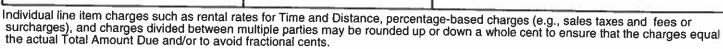
Return Branch

BROWNSVILLE HWY 77 4177 EXPRESSWAY 83 BROWNSVILLE, TX-78520

Charge Detail		THE SAFETY OF THE		
Description TIME & DISTANCE	Qty 1	Period DAY	Rate 60.00	Amount 60.00
TIME & DISTANCE	3	HOUR	19.80	59.40
		Sub ⁻	Γotal	119.40
10% TEXAS MOTOR VEHICLE TAX		PERCENT	10.00	12.24
TEXAS REIMBURSEMENT FEE -DAILY	2	DAY	1.49	2.98
	Total Charges	(USD)		134.62



Remit Payment in USD to	For Billing Inquiries	Payment Terms
EAN SERVICES, LLC PO BOX 840173	Tel#:(866) 278-9894 ARINQUIRY@EHI.COM	Payment Due Within 30 days of invoice date.
KANSAS CITY, MO 64184-0173		Late payments are subject to finance charge.





	inda Van Dalen	AND RELIGIO	oranie i	RESERVED AND THE PROPERTY OF T	Office	Brownsville	William Control
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that this s	tatement, the atta	achments and amo	unts claime	ed are true, correct, and	complete and that pa	yment for the amount claime	d has not been received.
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Omni 🕼 Hotels & Resorts

corpus christi | texas

900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA

TEXAS RIOGRANDE LEGAL AID

531 East St. Francis

Brownsville, TX 78520 US

WITTALEN, MARINELA E ALLIERO, RANDELLE S. L. LIEFSELLEBOR Room Number: 1625

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1/0

ARRIVAL	DEPARTU	RE CREDIT CARD	RATE PLAN	CATEGORY	ACC	OUNT
09/01/14	09/02/14	XXXXXXXXXXXXXXX8272	CBEND	ESP	1450	1752543
DATE	ROOM NÓ.	DESCRIPTION	REFERENCE	Y		AMOUNT
09/01/14	1625	LONG DISTANCE	1625/22:04/10/5182816677	71.		\$25.06
09/01/14	1625	ROOM CHARGE	#1625 VANDALEN, MARINDA	William .	13	\$115.00
09/01/14	1625	CITY OCC TAX - 9%	CITY OCC TAX - 9%		NT.	\$10.35
09/02/14	1625	VISA	VISA	571'v	4	(\$150.41)
09/02/14	1625	ADJ - LOCAL CALL	ADJ - LOCAL CALL			(\$25.06)
09/02/14	1625	VISA	CORRECTION	· 第二十二章	8	\$25:06

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TOTAL DUE:

\$0.00

OMNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA

Room Number: 1042

Daily Rate: 115.00

Room Type: DDNB

531 East St. Francis Brownsville, TX 78520 US

No. of Guests: 1 / 0

ARRIVAL	DEPARTU	IRE CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/03/14	09/04/14	XXXXXXXXXXXXXX8272	CBEND	ESP	14501783839
DATE	ROOM NO). DESCRIPTION	REFERENCE		AMOUNT
09/03/14	1042	WIFI INTERNET ACCESS	1042/1/15:25/WIFI INTERNE	TACCESS	\$9.95
09/03/14	1042	TOPSIDER LOUNGE	1042/3306/20:18/TOPSIDER	LOUNGE	\$64.67
09/03/14	1042	ROOM CHARGE	#1042 VANDALEN, MARIND	A	\$115.00
09/03/14	1042	CITY OCC TAX - 9%	CITY OCC TAX - 9%	64	\$10.35
09/04/14	1042	VISA	VISA		(\$206.87)
09/06/14	1042	VISA	CV8272 CREDIT		\$6.90
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64 • 67*

CREDIT DUE:

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Case 2:13-cv-00193 Document 1206-6 Filed on 02/07/20 in TXSD Page 23 of 38 / U

Page 1 of 1

Omni M Hotels & Resorts

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900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA TEXAS RIOGRANDE LEGAL AID 300 S TEXAS BLVD WESLACO, TX 78520 US Room Number: 656

Daily Rate: 115.00 Room Type: DDNB

No. of Guests: 1/0

ARRIVAL	DEPARTU	RE ČREDIT CARD	RÂTE PLAN	CATEGORY	ACCOUNT
09/03/14	09/05/14	XXXXXXXXXXXXXX8272	BAR7	BAR7	14501784933
DATE	ROOM NO.	DESCRIPTION	REFERENCE		AMOUNT
09/04/14	656	ROOM CHARGE	#656 VANDALEN, MARINDA		\$115.00
09/04/14	656	CITY OCC TAX - 9%	CITY OCC TAX - 9%	N	\$10.35
09/05/14	656	VISA	VISA		(\$132.25)
09/06/14	656	VISA	CV8272 CREDIT	4.7	\$6.90
	3, 2,				

115.00+ 10.35+ Ladan 105.35* OCT 1 6 2014

CREDIT DUE: (\$0.00)

MNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA

TEXAS RIOGRANDE LEGAL AID

531 East St. Francis

Brownsville, TX 78520 US

Room Number: 1044

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1/0

ARRIVAL	DEPARTUR	RE CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/01/14	09/05/14	XXXXXXXXXXXXX8272	CBEND	ESP	14501752544
DATE	ROOM NO.	DESCRIPTION	REFERENCE		AMOUNT
09/01/14	1044	TOPSIDER LOUNGE	1044/3201/21:46/TOPSIDER LO	JNGE	\$41.66
09/01/14	1044	ROOM CHARGE	#1044 VANDALEN, MARINDA		\$115.00
09/01/14	1044	CITY OCC TAX - 9%	CITY OCC TAX - 9%		\$10.35
09/02/14	1044	TOPSIDER LOUNGE	1044/3256/23:34/TOPSIDER LO	JNGE	\$33.54 ~
09/02/14	1044	ROOM CHARGE	#1044 VANDALEN, MARINDA		\$115.00
09/02/14	1044	CITY OCC TAX - 9%	CITY OCC TAX - 9%		\$10.35
09/03/14	1044	TOPSIDER LOUNGE	1044/3274/13:12/TOPSIDER LO	JNGE	\$38.39—
09/03/14	1044 \F6 ND	ROOM CHARGE	#1044 VANDALEN, MARINDA	Carrie Sant	or. \$115.00
09/03/14	1044 (1)	CITY OCC TAX - 9%	CITY OCC TAX - 9%		ie \$10.35
09/04/14	1044 000	ROOM CHARGE	#1044 VANDALEN, MARINDA	Family.	\$115.00
09/04/14		CITY OCC TAX - 9%	CITY OCC TAX - 9%	0 69787	640.25
09/05/14	1044	VISA	VISA		(\$642.59) \ (14.9)
09/06/14	1044 A	VISA	CV8272 CREDIT	C	\$27.60

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CREDIT DUE:

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TERMS: DUE AND PAY **BILL IS NOT WAIVED AN** INDICATED PERSON, CO AMOUNT OF THESE CH

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OMNI MHOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715 Reservations: 800-843-6664

VANDALEN, MARINDA

Room Number: 1042

Daily Rate: 149.00

Room Type: DDNB

No. of Guests: 1/0

US

ARRIVAL	DEPARTUR	RE CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT	
09/04/14	09/06/14	XXXXXXXXXXXXX8272	BAR7	BAR7	14501784924]
DATE	ROOM NO.	DESCRIPTION	REFERENCE		AMOUNT	
09/04/14	1042	ROOM CHARGE	#1042 VANDALEN, MARINDA		\$149.00	
09/04/14	1042	CITY OCC TAX - 9%	CITY OCC TAX - 9%		\$13.41	
09/05/14	1042	MORSELS, BAYFRONT TOWER	1042/8977/07;20/MORSELS, B	AYFRONT TOWER	\$3.25	-
09/05/14	1042	GLASS PAVILION RESTAURANT	1042/6769/13:08/GLASS PAVI	LION RESTAURAN	\$134.75	خ
09/05/14	1042	TOPSIDER LOUNGE	1042/3452/22:01/TOPSIDER L	OUNGE	\$10.66	-
09/05/14	1042	ROOM CHARGE	#1042 VANDALEN, MARINDA		\$149.00	
09/05/14	1042	CITY OCC TAX - 9%	CITY OCC TAX - 9%		\$13.41	
09/06/14:	1042	VISA	VISA	Not be seen to be	(\$501.31))
09/06/14	1042	ADJ - INDIVIDUAL ROOM CHARGE	ADJ - INDIVIDUAL ROOM CH	ARGE	(\$59.13)	
09/06/14	1042	ADJ - CITY TAX - 9%	ADJ - CITY TAX - 9%	Heren T.		413.48
09/06/14	1042	ADJ - STATE OCC TAX 6.0%	ADJ - STATE OCC TAX 6.0%	Po. W. Kiter	(A0 FE)	{
09/06/14	1042	VISA	CV8272 CREDIT		\$77.95	
09/06/14	1042 8	VISA	CV8272 CREDIT	Av stelle	\$17.88	l.



134.75+ 10.66+ 148.66* 149.00+ 149.00+ 13.41+ 13.41+ 324.82*

TOTAL DUE:

\$0.00

OMNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

ESTRADA, LIONEL

TEXAS RIOGRANDE LEGAL AID

300 S. TEXAS BLVD

WESLACO, TX 78520 US

Room Number: 1029

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1/0

ARRIVAL	DEPARTU	RE CREDIT CARD	RATE PLAN	CATEGORY	ACC	OUNT
09/03/14	09/04/14	XXXXXXXXXXXXXX8272	BAR7	BAR7	1450	1784923
DATE	ROOM NO.	DESCRIPTION	REFERENCE			AMOUNT
09/03/14	1029	ROOM CHARGE	#1029 ESTRADA, LIONEL			\$115.00
09/03/14	1029	CITY OCC TAX - 9%	CITY OCC TAX - 9%			\$10.35
09/04/14	1029	VISA	VISA			(\$132.25)
09/04/14	1029	GLASS PAVILION RESTAURANT	1029/6633/07:36/GLASS PA	/ILION RESTAURAN		\$18.40 -
09/04/14	1029	LONG DISTANCE	1029/08:22/1/5126803831	A.	100	\$6.47 -
09/04/14	1029	VISA	CV8272		10	(\$24.87)
09/06/14	1029	VISA	CV8272 CREDIT	3.5	- 12	\$6.90
00/00/14	1025			3.000		ALC: NO.

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OCT 1 6 2014

CREDIT DUE: (\$0.00)



Omni Hotels & Resorts

corpus christi | texas

900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA TEXAS RIOGRANDE LEGAL AID

531 East St. Francis

ardin in Dispersi

Brownsville, TX 78520 US

Room Number: 1452

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1/0

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ARRIVAL	DÊPARTU	RE CREDIT CARD		RATE PLAN	CATEGORY	ACCOUNT
09/07/14	09/08/14	xxxxxxxxx	X8272	CBEND	ESP	14501752541
DATE	ROOM NO.	DESCRIPTION		REFERENCE		AMOUNT
09/07/14	1452	ROOM CHARGE	(8)	#1452 VANDALEN, MARII	NDA	\$115.00
09/07/14	1452	CITY OCC TAX - 9%		CITY OCC TAX - 9%		\$10.35
09/08/14	1452	VISA		VISA		(\$132.25) \$6.90
09/08/14	1452	VISA	= #	CV8272 CREDIT		\$6.90

115·00+ 10·35+ 125·35*

PA 27)
OCT 1 6 2014

CREDIT DUE:

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

N

(\$0.00)

INI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd. Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA

Room Number: 1454

Daily Rate: 115.00

Room Peper Divill

Hot of Sucres, 170

L UM

Room Type: DDNB

No. of Guests: 1/0

CALLSO EN AARINO

and King St. Prances

Provincello, TX 7312

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531 East St. Francis Brownsville, TX 78520 US

ARRIVAL	DEPARTU	RE CREDIT CARD		RATE PLAN	CATEGORY	ACC	OUNT
09/07/14	09/08/14	XXXXXXXXXXXXXX8272	2	CBEND	ESP	1450	1783841
DATE	ROOM NO	. DESCRIPTION		REFERENCE		#1	AMOUNT
09/07/14	1454 L	ROOM CHARGE		#1454 VANDALEN, MARINDA			\$115,00
09/07/14	1454	CITY OCC TAX - 9%		CITY OCC TAX - 9%			\$10.35
09/08/14	1454	VISA		VISA	W 15		(\$132.25)
09/08/14	1454	TOPSIDER LOUNGE		1454/3575/15:28/TOPSIDER LO	DUŅGE		\$40.64 ~
09/08/14	1454	VISA		VISA8272	10 1		(\$40.64) -
09/08/14	1454	VISA		CV8272 CREDIT	13.	4	\$6.90

115-00+ 10 - 35+ 125 • 35 *

40.64+ 40.64*

CREDIT DUE: (\$0.00)

OMNI HOTELS & RESORTS

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VANDALEN, MARINDA COASTAL BEND LAW FIRMS 531 East St. Francis

3/

Brownsville, TX 78520 US

Room Number: 1456

Daily Rate: 115.00 Room Type: DDNB

No. of Guests: 1/0

ARRIVAL	DEPARTU	RE CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/07/14	09/08/14	XXXXXXXXXXXXX8272	CBEND	ESP	14501785625
DATE	ROOM NO.	DESCRIPTION	REFERENCE		AMOUNT
09/07/14	1456	ROOM CHARGE	#1456 VANDALEN, MARINDA		\$115.00
09/07/14	1456	CITY OCC TAX - 9%	CITY OCC TAX - 9%		\$10.35
09/08/14	1456	VISA	VISA		\$6.90
09/08/14	1456	VISA	CV8272 CREDIT	1 12 3	\$6.90

Lodsy 10.35+
125.35*

OCT 1 6 2014

CREDIT DUE: (\$0.00)

BEST VALUE INN - RAYMON 450 S. EXPRESSWAY 77 / I-69

RAYMONDVILLE, TX 78580

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Printed: 9/2/2014 - 8:59pm

MARINDA O VANDALEN Guest #25: 055384

207 E WASHINGTON ST **BROWNSVILLE TX 78520**

Room: 1052 BED KIC NON SMO

Daily Rate: 59.99 + Tax

Check-in: 09/02/14 8:59pm Out: 09/03/14 Nights: 1 Guests: 1/0

2 2 2 2 2 2 2 2 2 2	36	181
CHADCEC		DAVMENT

CHARGES l'oral Credit Cash Bill otal Balance Date Room Phone Misc. Tax 66.59 0.00 66.59 0.00 0.00 0.00 6.60 0.00 9/2/14 59.99

(Taxes - CITY: \$3.00, STATE: \$3.60)

AMOUNT TENDERED: \$0.00

CHANGE: S0.00

Check-out time: 11:30am Check-in time: 4:00pm

Guest Signature:



OUT OWN TRAVEL EXPENSE FORM Case 2:13-cv-00193 Document 1206-6 Filed on 02/07/20 in TXSD Page 31 of 33 * Must be completed by the employee and verified and approved by Branch Manager within fifteen (15) working days after expense was incurred. 9019 Name: Jose Garza Office san antonio VIDO7 - ON Destination new orleans File Number Purpose of Trip: attend oral argument at the 5th Cir. Departed from: Office Home Time of Departure: 10:15am Date 12/4/17 Returned to: Home Office Time of Return: 4:30 PM Date 12/5/17 Personal Automobile Use Miles Driven Date From: To: Beginning **Ending** Odometer #'s Date From: To: Beginning Ending Odometer #'s Date From: To: Beginning Ending Odometer #'s Date From: To: Beginning Ending Odometer #'s ð Miles are paid at \$0.53 **Total Miles** 0 Total Allowance for Personal Automobile Use \$0.00 Air Fare **Receipts required** DEPARTURE ARRIVAL TIME **FROM** TO DATE TIME DATE 12/4/17 11:45am san antonio new orleans 12/4/17 1:30pm 12/5/17 2:30pm new orleans san antonio 12/5/17 4:30 PM Total Air Fare Expense \$146.96 Did TRLA pay airfare in advance, please place an X in the following YES X Meal Allowance: DATE(S) of Trip Cost 12/04/17 \$45.00 12/05/17 \$45.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00 Total Meal Expenses \$90.00 Lodging Allowance: "*Receipts required" # of Nights Amt Per Day Cost 12/4/17 Night&Tax \$88.60 \$88,60 Night&Tax \$0.00 Total Lodging Expenses \$88.60 Other Expenses: **Receipts required** EXPENSES Date Cost Cab Fare 12-4-17 to hotel, and 12-5-17 to airport, \$36.00 x 2 = 72.00 \$72.00 Car Rental Shuttle Parking airport pkg in San Antonio \$24.00 Tips & Incidentals (Explain) Total of Other Expenses \$96.00 **Grand Total \$** 421.56 Amount Claimed: \$ 421.56 Amount Due Traveler: \$ 421.56 ADVANCE RECEIVED: \$ 0.00 Amount Due TRLA: \$ Advance Check Number: Advanced Airfare: \$ 0.00 I certify that this statement, the attachments and amounts claimed are true, correct, and complete and that payment for the amount claimed has not been

Employee Signature	(2-2)-(7 Date	Primary Supervisor's Signature	Date
FOR ACCOUNTING USE ONLY			
Account No: 7440-39-00-01		Account No:	
Account No:		Account No:	

Case 2:13-cv-00193 Document 1206-6 Filed on 02/07/20 in TXSD Page 32 of 33





FOR COMMERCIAL SCHOOLS OF EAST AND SCHOOL AND COMMERCIAL SCHOOL AND SCHOOL AN

Paradby

SOUTHWEST AIRLINES

Driver's Name

Cab Number_

KELEIPI

SOUTHWEST AIRLINES

POTE: 20NOV17 CONFIRMATION NUMBER: SP9LYV A FN: 887 % EXPIRATION DATE: 20NOV18

O CONJUNCTION TICKETS:

TICKET : 5268786465634

Flt Date Dep Customer Name Acc BC MSY 578 **04DEC** 1145A 0105P N GARZA/JOSE **ØSDEC** 0230P 0410P

Base Fare Fees Taxes To 110.29 35.67 146

EF/NONTRANSPERABLE STANDBY REQ UPGRADE TO Y BG WN

TICKET TOTAL

110.29 36.67

(WANNA GET AW.

146

Add This Trip To Your Calendar

You're all set.

Add to Calendar

Your card has been charged, and a confirmation email is on its way.

La Quinta Inn & Suites New Orleans Downtown

Q 301 Camp Street, New Orleans, LA 70130

Guest Name	1720	ii)	
Check-in			Monday, December 4, 2017
Check-out			Tuesday, December 5, 2017

This booking will be 100% refundable if cancelled before 11:59pm local time December 2. After this time, the booking is completely non-refundable and cannot be changed or cancelled.

Your Booking Number	WC7Q3W6
Total Points Earned Posted after check-out	76 500 Earned Rapid Rewards® points
Total Paid AMEX ending in 3002	\$88.60 USD
Your Receipt	Download Your Receipt (PDF) (/receipt/WC7Q3W6 /caf1f75df9ef81d9b21a4f521b9090f5b86ebdbd)

JAN - 5,2018

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Taylor Exhibit G

Other Trial Expenses (Interpreter)

Case 2:13-cv-00193 Document 1206-7 Filed on 02/07/20 in TXSD Page 2 of 3





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96335

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CK/Dep# 96335

9/30/2014

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Mobile Phone: 361-549-6511

E-mail: sisitranslations@gmail.com

INVOICE

September 26, 2014

Via email: MVanDalen@trla.org Atopete@trla.org

For Professional Services Rendered

Ms. Marinda van Dalen TEXAS RIO GRANDE LEGAL AID, INC. 531 East St. Francis Street Brownsville, TX 78520



DATE

DESCRIPTION

09/2014 Interpret Trial Testimony of Mr. Eulalio Mendez, Jr. in Cause No. 2:13-CV-193 & Consolidated cases, Belinda Ortiz et al. vs. State of Texas et al., in the Corpus Christi Division of the United States District Court. Travel time portal-to-portal, review of operative pleadings & mileage. (2-hour miminum).

Invoice Total

\$206.00

Courtesy discount 15%

\$ 31.00

Total Due

\$175.

**Payment terms: Due upon receipt. PLEASE MAKE CHECK PAYABLE TO CARMEN M. MACOSSAY.

Ms. Marinda (& Ms. Anna & Mr. Doggett), thank you for the opportunity to serve you! To insure proper credit, please enclose a copy of this invoice with your remittance.

*Federally Certified Spanish Court Interpreter--Certification No. 98-067.